

IND104 – Karen Orlando (cont'd)

IND104-2
(cont'd) or was supported by NPS, and all the reasoning, however flawed and illogical or in some cases absent it may be, and the necessary NEPA documentation is following.

IND104-3 There is a problem here with management at NPS and their behavior under this docket and it is not clear what level this is occurring at, whether at Gateway in specific or the Northeast Region. But this problem has not just occurred during testimony on the legislation that has passed. It is ongoing in Section 106 review and with NPS behavior as a cooperating agency and it should not be allowed to progress anywhere near the point of an authorization of a lease to Transco of these hangars only to have that lease be successfully challenged in a court of law.

IND104-4 On page 19 of Transco's Dec 3 submittal, Transco states: c. "Transco understands that if a *no adverse affect* is determined for the Project, the FERC will not be required to consult with the ACHP or execute a Programmatic Agreement."

The public has offered that there will be and should be an adverse affect for this project and moreover that this affect will be significant. According to the applicable laws:
<http://www.achp.gov/regs-rev04.pdf>
(36 CFR 800)

"Participants in the section 106 process may seek advice, guidance and assistance from the Council on the application of this part to specific undertakings, including the resolution of disagreements, whether or not the Council is formally involved in the review of the undertaking. If questions arise regarding the conduct of the section 106 process, participants are encouraged to obtain the Council's advice on completing the process." I am a legal party and participant in this process and I ask that the Council be asked for advice, guidance and assistance and formally involved. I ask that FERC right now formally involve the Council in the review as there should be a finding of significant adverse affect in adaptively using these hangars in the park for the purpose of housing this metering and regulating station.

If the FERC needs guidance on what ADVERSE effects are, see 36 CFR 800.5

(2) Examples of adverse effects.
Adverse effects on historic properties
include, but are not limited to:
(i) Physical destruction of or damage
to all or part of the property; 6

IND104-3 Comment noted.

IND104-4 The Section 106 review process for the Projects is discussed in Section 4.10.1 of the EIS.

IND104 – Karen Orlando (cont'd)

- (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines;
- (iii) Removal of the property from its historic location;
- (iv) **Change of the character of the property's use or of physical features within the property's setting** that contribute to its historic significance;
- (v) **Introduction of visual, atmospheric or audible elements that diminish the integrity** of the property's significant historic features;
- (vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- (vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and **legally enforceable** restrictions or conditions to ensure long-term preservation of the property's historic significance.

Further when resolving a finding of affect, under the applicable laws: 36 CFR 800.6 4
"The agency official should also consider **the extent of notice and information concerning historic preservation issues afforded the public at earlier steps in the section 106 process** to determine the **appropriate level of public involvement when resolving adverse effects** so that the standards of § 800.2(d) are met."

IND104 – Karen Orlando (cont'd)

IND104-5 From the FERC's very first interaction with the public through the current date, not only has the timing of the public's awareness of HR2606 which became Public Law 112-197 been questioned, as stated and in fact, Transco's first public meetings were held after NPS testimony on this bill had occurred. There are numerous news reports locally about the lack of public knowledge of this bill, whether by politicians or NPS. Moreover, under this docket, citizens and park users have been forced to explain to FERC what the scope of Section 106 review should include under docket CP13-36 as was testified to by NPS in Senate Subcommittee and not the other way around. We have provided what the requirements are for NPS leasing as applicable under the language of Public Law 112-197 and offered evidence that those requirements have not been met. There is nothing in the draft EIS or anything from NPS that appears to speak to the requirements of the leasing law of NPS described in Barbara Pearson and Joe Bonesario's and mine and Joseph Nerone's intervening document from **early winter 2013**. In doing so, we are essentially and have been doing the job of the National Park Service, a cooperating agency, under this docket. Gay Snyder, also an intervenor, submitted information from NPS, Request for Proposals for leases of historic buildings at Fort Hancock and information by NPS on what would or could be deemed an appropriate use of historic buildings and nothing remotely like this metering station was suggested.

Intervenors have also told FERC that NPS misrepresented not only HR2606 intent but they have refused to answer the public on how they will decide or view the issue of appropriateness of the adaptive use of these hangars and where the public's views will come into play.

IND104-6 If FERC does not understand that we have a point when we say that this lease may set precedent in this park, **leading to further impact not only at this park but potentially influencing leasing decisions at other parks**, perhaps FERC would like to see a report published by the National Trust for Historic Preservation recommending more historic leases and adaptive reuses for NPS where this use is already footnoted as an example that this is very likely to occur?
<http://www.preservationnation.org/information-center/saving-a-place/public-lands/resources/NTHP-NPS-and-Historic-Leasing-FINAL.pdf> (page 52 footnote)
 Even this document from the National Trust for Historic Preservation supports what park users and intervenors have been saying about the GMP and the information on Fort Hancock reuse offered: "The committee (established under FACA) is tasked with **exploring adaptive reuse options for the site that will complement the park's General Management Plan**, which is also currently under review." Page 41.

IND104-5 See the responses to comment CM1-12 and CM1-34. The FERC has and will continue to consider input from the public on the Section 106 review process.

IND104-6 Comment noted.

IND104 – Karen Orlando (cont'd)

IND104-6
(cont'd) I will say right now that it was the position of the National Park Service at a Jamaica Bay Task Force that I attended this year that the adaptive reuse of these hangars had nothing to do with this park's GMP. I say that not to point a finger at any NPS employee in particular but as a general example of exactly how information about this project and NPS responsibility has been presented to the public. The draft EIS does say that NPS along with the FERC will be looking at this use according to the GMP.

IND104-7 Is there a reason why Transco has refused to supply renderings of the signage that would be required on the historic hangars in the park under docket CP13-36 and to the necessary agencies as part of their Section 106 submittals? Is there a reason why NPS has not required or asked about this from Transco outside of NPS aversion to project signage even when that signage is a very important part of public safety requirements for natural gas facilities? That signage will be required on those hangars. Perhaps there is some issue with placing signs on historic structures? Has the National Park Service made any comments about the bollards that will be placed around these hangars outside of stating they prefer these over planters with flowers as they did under Appendix 4G?

IND104-8 With all due respect, intervenors and citizens, mostly park users have been forced to repeat themselves in this process and the only reason why we are forced to do so is because we are not government representatives with titles or lawyers but citizens. We have pointed out **what the requirements are for leasing under Public Law 112-197 since our intervening documents last winter. That law was only signed by the president in late November 2012 and it was not uncontroversial and unopposed by park users and citizens. Our comments about this law were not untimely.** We have been backing up many of our assertions with factual evidence and reference to law for most of the time we have been participating under docket CP13-36. On the other hand neither the National Park Service nor Transco have offered any evidence or information that supports that the adaptive reuse of these hangars for the purpose of a lease to Transco to house their metering and regulating station will be compliant with the terms and conditions specified in Public Law 112-197: **that the lease shall be in accordance with section 3(k) of the National Park System General Authorities Act (16 U.S.C. 1a-2(k)) as anyone can plainly read here:** <http://www.gpo.gov/fdsys/pkg/PLAW-112pub1197/html/PLAW-112pub1197.htm>. We are not dropping this on the FERC, Transco or the National Park Service last minute. We

IND104-7 The required signage for the M&R facility would be determined by the NPS and Transco in accordance with requirements of the DOT in 49 CFR Part 192.

IND104-8 See the responses to comments CM1-12 and CM1-34.

IND104 – Karen Orlando (cont'd)

IND104-8 (cont'd)	have given more notice than we were given in fact. We stated these things very explicitly in our intervening documents. The National Park Service testimony in Senate Subcommittee that speaks to Section 106 and that the appropriateness of the adaptive reuse would come through Section 106 and NEPA, which includes the public's views and concerns, was submitted to FERC by me long ago.
IND104-9	<p>On page 5-16 of the draft EIS FERC states "they will not be able to make a Determination of Effect until all necessary reports and studies have been filed and consultation is complete" after saying that the "CPP would not be filed for review and approval until and unless the Commission authorizes the Rockaway Project." It sounds to me like the FERC will authorize this project and then a Determination of Effect on the hangars will be decided, which sounds like a resolution or any effect then could delay this project as ACHP is consulted.</p> <p>However, the paragraph that proceeds this says that the "Determination of Effect will include an assessment of the proposed design relative to the Secretary of the Interior's Standard for the Treatment of Historic Properties (36 CFR 68) and in particular the Standards for Rehabilitation." It says nothing else about Determination of Effect or anything else being considered under Section 106.</p>
IND104-10	<p>At what point is the use and "the appropriateness of the use" going to be considered either in the draft EIS, Section 106 review or both as to date it appears that it is not being considered? When was NPS going to address this or bring this to FERC's attention as NPS said in testimony to the Senate subcommittee that it would be addressed during Section 106 and through NEPA review?</p> <p>Where is the evidence in the draft EIS that this lease would be compatible with this park's programs, values, purpose and enabling legislation? Where is the evidence that lease would be compliant with park planning documents? The lease would not have been compliant with even the outdated GMP. Where is the evidence that NPS has any intent at all to comply with section 3(k) of the National Park System General Authorities Act (16 U.S.C. 1a-2(k)) in issuing a lease of these historic hangars? Are they going to do this after a certificate is granted by the FERC for this project in the 90 day period they have to authorize a lease if they are not stopped from doing so by a lawsuit or injunction that they would most likely lose?</p>
IND104-11	The FERC will be required to consult with ACHP. They should be consulting right now with ACHP. If Section 106 and this NEPA process is not including the appropriateness of

IND104-9	The Section 106 process is described in Section 4.10.1 of the EIS. The intent of Recommendation 23 is to ensure that all required information is filed with the Secretary and the Section 106 process is complete prior to construction.
IND104-10	See the response to comment CM1-34.
IND104-11	The Section 106 review process for the Projects is discussed in Section 4.10.1 of the EIS.

IND104 – Karen Orlando (cont'd)

IND104-11
(cont'd) | the use of these buildings and it appears that it is not so far, it is insufficient in scope.
This needs to be rectified.

Thanks,

Karen Orlando

I am certifying that all on the service list have been served.

IND105 – Stephen Plachta

FEDERAL ENERGY REGULATORY COMMISSION ROCKAWAY DELIVERY LATERAL PROJECT AND NORTHEAST CONNECTOR PROJECT (DOCKET NOS. CP13-36-000 AND CP13-132-000)		ORIGINAL
Comments can be: (1) left with a FERC representative; (2) mailed to the addresses below or (3) electronically filed ¹ .		
Please send copies referenced to Docket Nos. CP13-36-000 and CP13-132-000 to the addresses below.		
For Official Filing (send 2 copies): Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE, Room 1A Washington, DC 20426	Another Copy (send 1 copy): Gas Branch 3, PJ-11.3 Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426	
COMMENTS: (PLEASE PRINT LEGIBLY) [attach an additional sheet if necessary]		
IND105-1	The new summer time schedule for the pipeline construction will endanger the public and is unacceptable. A natural gas facility is NOT a proper adaptive reuse of our historically significant buildings. The public will never be allowed in the building, the facility will not help us interpret our aviation history, and it will serve no recreational purpose.	
IND105-2		
Commentor's Name and Mailing Address (Please print legibly) <u>Stephen Plachta</u> <u>2524 E 17th Ave</u> <u>Spokane, WA 99223</u>		FILED SECRETARY OF THE COMMISSION 2013 DEC -5 A 9 05 FEDERAL ENERGY REGULATORY COMMISSION
<small>¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(ii) and the instructions on the Commission's Internet website at http://www.ferc.gov under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "eRegister." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." In addition, there is an "eComment" option available online at: http://www.ferc.gov/docs-filing/eComment.asp, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account; however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. The comment period ends November 25, 2013.</small>		

IND105-1 See the response to comment CM1-14.

IND105-2 See the response to comment CM1-34.

IND106 – Siena Chrisman

20131205-0011 FERC PDF (Unofficial) 12/05/2013

FEDERAL ENERGY REGULATORY COMMISSION

ROCKAWAY DELIVERY LATERAL PROJECT AND NORTHEAST CONNECTOR PROJECT
(DOCKET NOS. CP13-36-000 AND CP13-132-000)

Comments can be: (1) left with a FERC representative; (2) mailed to the addresses below or (3) electronically filed¹.

Please send copies referenced to Docket Nos. CP13-36-000 and CP13-132-000 to the addresses below.

<p><u>For Official Filing (send 2 copies):</u></p> <p>Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE, Room 1A Washington, DC 20426</p>	<p><u>Another Copy (send 1 copy):</u></p> <p>Gas Branch 3, PJ-11.3 Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426</p>
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COMMENTS: (PLEASE PRINT LEGIBLY) [attach an additional sheet if necessary]

IND106-1
I am concerned about the proposed pipeline project at Floyd Bennett Field. The construction of the pipeline during the summer season will endanger the public's health with the introduction of several dangerous chemicals in the area during prime beach season for New Yorkers. Additionally, the use of the historic buildings in the area for pipeline infrastructure is in no way congruent with appropriate historic use of historic buildings. I urge you to reevaluate this project. Thanks for your consideration.

IND106-2
Commentor's Name and Mailing Address (Please print legibly)

Siena Chrisman
369 5th St #3
Brooklyn NY 11215

2013 DEC -5 A 9 06
FILED
SECRETARY OF THE
COMMISSION
FEDERAL ENERGY
REGULATORY COMMISSION

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "eRegister." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." In addition, there is an "eComment" option available online at: <http://www.ferc.gov/docs-filing/eComment.asp>, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account; however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. The comment period ends November 25, 2013.

IND106-1

Your opposition to the Rockaway Project and to construction during the summer is noted. Public health will not be endangered by construction activities.

IND106-2

See the response to comment CM1-34.

IND107 – Mary Lizzi

20131205-5093 FERC PDF (Unofficial) 12/5/2013 12:58:23 PM

Mary Lizzi, Breezy Point, NY.

IND107-1 | I am concerned about an increase in radon exposure from this gas pipeline
| in such a highly populated area.
IND107-2 | Also, the gas industry should be kept out of our national parks. The
| metering and regulating facility should not be built in the historic hangars of
| Floyd Bennett Field.
| Please consider an alternative solution to increase the supply of gas
| service in New York City.

Thank you,
Mary Lizzi

IND107-1 See the response to comment CM1-21.

IND107-2 Your opposition to use of NPS lands for the Rockaway Project is noted.
Various alternatives to the Projects are discussed in Section 3.0 of the EIS.

IND108 – Karen Hirsch

20131206-5007(28963046).txt

IND108-1 Karen Hirsch, New York, NY.
I urge you to not allow Rockaway Pipeline to be built. The risk of explosions and other accidents exists. Serious accidents, injuries and deaths and long-term contamination of water tables from pipelines such as this has already occurred - despite assurances of safety by gas companies.
As a citizen of NY State, I am completely opposed to this Pipeline and hope with all my heart that it will not be permitted.

Page 1

IND108-1

Your opposition to the Rockaway Project is noted. Pipeline safety is discussed in Section 4.12 of the EIS.

IND109 – Barbara Pearson

20131205-5049 FERC PDF (Unofficial) 12/5/2013 10:08:25 AM

Ms. Bose:

IND109-1 The following is taken directly from the National Park Service's DO-12 Handbook (NEPA compliance) Section 1.2 C – Page 4:

Initiating or completing environmental analysis after a decision has been made, ***whether formally or informally***, is a violation of both the spirit and the letter of the law. (Emphasis added.)

And then there's this from the same source, section 1.1 B – Page 2

Although it is termed a handbook, most of the sections derive in whole or in part from the CEQ regulation or Interior NEPA guidelines, ***giving them the force of law***. (Emphasis added.)

Under most other circumstances I would be inclined to believe those passages stated everything that needed to be stated about whether NPS has been acting lawfully in its pursuit of a leasing arrangement to house the M&R station in the hangars at Floyd Bennett Field. However, these circumstances include intentional misrepresentation of the facts and disregard for the law on the part of NPS and so I will supplement what those passages state.

As Ms. Karen Orlando has made clear to you many times, representatives of NPS testified before Congress regarding this leasing long before any NEPA process was initiated. Many NPS personnel at high levels of management were knowledgeable and supportive of the legislation that was being hustled through Congress long before any NEPA process was initiated. ***Only someone who is intentionally misrepresenting the facts could deny that these actions on the part of NPS prove that NPS had already made an informal decision to lease the hangars for the M&R station.***

NPS has not only violated its management policies, it has broken the law and will be taken to task for that. The FERC should not accept Transco's contention that they have the required approval for leasing Hangars 1 and 2 when those from whom they believe they have acquired said approval have acted illegally in providing (that is, trying to provide) it.

I ask once again that you deny Transco's claim to have acquired approval for the leasing of the hangars for their M&R station.

IND109-1

The NPS has not issued a lease to Transco. See the responses to comments CM1-12 and CM1-34.

IND110 – David Fisher

20131206-5008(28963142).txt

IND110-1 David Fischer, brooklyn, NY.
| gas drilling, pipelines and LNG ports will be the death of humanity. i know we need
| to cook and stay warm, but sustainability is more important

IND110-1

Comment noted.

Page 1

IND111 – Edith Kantrowitz

20131206-5009(28963176).txt

IND111-1 Edith Kantrowitz, Brooklyn, NY.
Natural gas pipelines are inherently dangerous, they leak, they rupture, and this can cause catastrophic explosions like several years ago in San Bruno, CA where an explosion killed nine people. Just a few weeks ago, a major pipeline accident in Texas caused the evacuation of the entire surrounding area.

These explosions are becoming increasingly problematic, and the state of pipeline safety inspection in this country is terrible - federal mandates require inspection only once every seven years. Williams Transco has a particularly abysmal safety record - 35 major accidents since 2006. In 2009, they had a pipeline accident that injured five people and leveled 100 homes. In a 2011 incident, flames reached 100 feet into the sky for 90 minutes after the gas was turned off. And in Floyd Bennett Field, where the metering and regulating station would be constructed, it is my understanding that the gas would have to be turned off by remote control from Texas. We also know that there have been problems with inadequate fire hydrants at Floyd Bennett.

New Yorkers do not want to see a catastrophe at Floyd Bennett Field. This project should not go forward; it is just too unsafe. And let us not forget that natural gas pipelines are not only inherently dangerous, but they are also an identified terrorist target. Please do not approve this project.

Page 1

IND111-1 Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS.

IND112 – Ellen Belcher

20131206-5011(28963196).txt

Ellen Belcher, NYC, NY.

IND112-1 I am writing to express my concerns about the Rockaway Delivery Lateral Project. This project should be denied as it threatens one of the few natural seaside areas available to New Yorkers. I have spent a lot of time on the Riis Park, Rockaway and Sandy Hook (NJ) beaches and national seashore, including camping there. This pipeline threatens not only human use of these natural areas but also fish, wildlife including endangered species.

Here are a few of my concerns.

IND112-2 This Project Should Not Be Segmented To Avoid Review
The Rockaway Lateral Delivery Project under FERC review has 2 parts: 1) a 3.2-mile pipeline that would be trenched into the ocean floor and run beneath Riis Beach in Queens, and 2) a Metering & Regulating Facility to be built in historic hangars at Floyd Bennett Field in Brooklyn. But there is a 1.6-mile gap between those 2 pieces of the project. This summer, National Grid "bridged" that future gap with their Brooklyn-Queens Interconnect (B-QI), Phase I. Because the B-QI has been falsely categorized as a local distribution pipe, National Grid was allowed to construct it under the Rockaway Inlet-through the Special Natural Waterfront Area and Significant coastal Fish and Wildlife Habitat of Jamaica Bay-without any environmental review. In 2012 the EPA advised FERC in its review: "A comprehensive evaluation of cumulative, indirect and secondary impacts should be presented. The cumulative impacts analysis should consider the environmental impacts of the National Grid pipeline, without which the Rockaway Delivery Lateral would not be constructed." And federal case law says a project cannot be segmented so as to avoid review. FERC has ignored the EPA advice and the law. FERC should include a comprehensive evaluation of the cumulative impacts of the entire project-including the National Grid pipeline-in its environmental review.

IND112-3 I am concerned about Pipeline Safety
"Since 1986, pipeline accidents have killed more than 500 people, injured over 4,000, and cost nearly seven billion dollars in property damages." [1] in the United States alone. The Rockaway Lateral Pipeline will be vulnerable to leakage during construction, from natural disasters, from terrorism, and from corrosion. Current national inspections of pipelines are inadequate, with only 7% of natural gas lines inspected each year. The Pipeline and Hazardous Materials Safety Administration (PHMSA) is chronically short of inspectors. It has funding for only 137, but had only 110 inspectors on staff in 2010. Transco plans its own in-person inspections only once every 7 years. And pipelines DO explode: About 300 per year, on average, causing property damage, injuries – and death.

1. Lena Groeger, Pipelines Explained: How Safe are America's 2.5 Million Miles of Pipelines? Pro Publica November 15, 2012.

IND112-4 I am concerned about Fire and Flood Hazards, especially at Floyd Bennett Field, where I camped this summer.
"The transportation of natural gas by pipeline involves some incremental risk to the public due to the potential for an accidental release of natural gas. The greatest hazard is a fire or major pipeline rupture." (Draft EIS 4.12)

In Floyd Bennett Field, the Metering & Regulating Facility's regulator vault will be placed one foot above the floor of an airplane hangar which is at a 16' elevation above sea level. This is in a flood zone where water crested at 14' after Hurricane Sandy. The potential mix of seawater and gas is a dangerous one.

When regulator vaults flood, the regulator mechanism's ability to reduce gas pressure can be significantly impaired. Water can cause the regulator to be stuck in the open position, dramatically increasing the pressure. If gas comes into a home or business at a higher pressure than it's supposed to, a fire or explosion can result.

Page 1

IND112-1 Your opposition to the Rockaway Project is noted. Impacts on Rockaway Beach are discussed throughout the EIS. Impacts on land uses are discussed in Section 4.8 of the EIS. Impacts on wildlife, including fish, are discussed in Sections 4.5 and 4.6 of the EIS. Impacts on threatened and endangered species are discussed in Section 4.7 of the EIS.

IND112-2 See the responses to comments CM1-19 and CM1-56.

IND112-3 Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS.

IND112-4 See the responses to comments CM1-8 and CM1-50.

IND112 – Ellen Belcher (cont'd)

	<p>20131206-5011(28963196).txt</p>
IND112-4 (cont'd)	<p>Williams Transco claims that the likelihood of flooding is not significantly greater now than in the summer of 2012, just before Hurricane Sandy, despite authoritative findings of the Intergovernmental Panel on Climate Change (IPCC) that sea level rise is inevitable and man-made.</p>
IND112-5	<p>I am concerned about Impacts on Protected Species The project will have negative impacts on endangered and protected species. The dEIS acknowledges that this project "is likely to adversely affect Atlantic Right Whale and Atlantic Sturgeon," and that it may also have impacts for the Leatherback Sea Turtle, Kemp's Ridley Sea Turtle, Green Sea Turtle, Loggerhead Sea Turtle, Roseate Tern, Piping Plover, and Seabeach Amaranth. These impacts result from a variety of factors including pile driving noise, dredging, ocean debris, and the potential for collision with vessels</p>
IND112-6	<p>I am concerned about the Impacts on Marine Wildlife Noise in the immediate area of pile driving for pipeline construction would exceed the injury threshold for fish, and the behavioral disturbance threshold for sea turtles; and would exceed the behavioral disturbance for marine mammals for a distance of 2.86 miles. In fact, Williams Transco has applied to the National Ocean and Atmospheric Administration (NOAA) for authorization for "Intermittent Level B Harassment" of six marine mammal species. Construction of the offshore pipeline also would directly disturb approximately 38 acres of seabed due to dredging and jetting. Benthic species in these areas, such as Surfclams, most likely would perish.</p>
IND112-7	<p>I am concerned about the impacts on Essential Fish Habitat The pipeline will be located in a marine area that supports Essential Fish Habitat for 21 species. In addition to noise impacts discussed above, offshore excavations would create turbidity plumes in the water column that could clog fish gills, obscure visual stimuli, and reduce food intake for some fish. It is estimated that up to 402 acres of seabed could be affected by sedimentation. Thank you for your consideration. Please do not approve this project.</p>
	<p>Page 2</p>

IND112-5

Comment noted. Impacts on threatened and endangered species are discussed in Section 4.7 of the EIS.

IND112-6

Comment noted. Impacts on marine mammals are discussed in Section 4.5.2.2 of the EIS.

IND112-7

Comment noted. Impacts on EFH are discussed in Section 4.6.3 of the EIS.

IND113 – Hary Bubin

20131206-5051(28963389).txt

Hary Bubin, Bronx, NY.

IND113-1 we already know that humans have many concerns about this pipeline, including the potential for leaks and explosions, inappropriate use of national parkland, exposure to radon, accelerating climate change, encouraging fracking, disrupting beach use, etc.

But what about all the other living beings that will be impacted by this project and are not able to speak up for themselves or write comment letters? For example, did you know that in connection with the project's construction Williams Transco has applied to the National Marine Fisheries Service for "Incidental Harassment Authorization" for seven marine mammals? These include gray seals, harbor seals, harp seals, the North Atlantic right whale, bottlenose dolphins, harbor porpoises, and short-beaked common dolphins.

IND113-2 A number of endangered and protected species may be affected, as well. Williams Transco has acknowledged that the project "is likely to adversely affect" the Atlantic sturgeon, and "may affect" the North Atlantic right whale, leatherback sea turtle, Kemp's ridley sea turtle, green sea turtle, and loggerhead sea turtle. One of the most serious possible impacts is exposure to underwater noise resulting from pile driving in the construction process. But the dEIS also mentions a host of other concerns, including possible injuries from collisions with construction vessels or equipment, possible loss of feeding habitat as fish populations and organisms that dwell on the ocean bottom are disturbed, exposure to floating debris, exposure to toxic sediments, etc. (The dEIS states that 38 acres of seabed will be directly impacted by construction, and another 402 acres will be affected by sediment stirred up in the construction process. Some of this sediment is likely to include unidentified or proprietary substances that are toxic to marine life.)

IND113-3 The Atlantic sturgeon is far from the only fish that may be affected. In fact, within the project construction area, Essential Fish Habitat has been identified for 39 fish species, including flounder, monkfish, bluefish, black sea bass, and the Atlantic, Spanish and king mackerel. Williams Transco states that, "Overall, impacts on managed species identified as having EFH in the Project area will vary depending on the species." In addition to the noise effects mentioned above, these impacts may include increased water turbidity from construction operations, direct loss of eggs and larvae during construction trenching operations, and reduction in available forage due to reduction of benthic (bottom dwelling) community densities.

IND113-4 While Williams Transco states that benthic communities will re-establish over a short period of time, the timeline for this to happen is not at all certain. It will likely take several years for pre-construction levels to be established, and since maintenance will disrupt the trenched area again every seven years, the cumulative impacts may result in permanent ecosystem damage. Transco Williams has also acknowledged that their new plans to perform construction during the spring and summer, rather than during the winter as originally intended, may have a greater impact on benthic organisms.

IND113-5 And what about birds? Well, there are plenty of them in the project construction area, as well as Jamaica Bay and Floyd Bennett Field, including protected species like the roseate tern, and the piping plover. Williams Transco does not expect birds to suffer any impacts directly related to construction. But do we really think negative environmental impacts will completely cease after the construction phase? We know that shale gas pipelines continually leak methane. How will that affect the birds and the surrounding ecosystem?

IND113-6 Williams Transco has proposed a variety of "mitigation" measures aimed at reducing or limiting the environmental impacts of the pipeline's construction, such as keeping a watch out for whales and sea turtles and holding off on construction operations when they are sighted. But do we really know how effective these measures will be? In many instances, Williams Transco asserts that possible negative impacts will be "minimal," they will be temporary, or they will only affect "individuals," not "populations." Does that mean it's acceptable if only a few sea turtles or dolphins are injured by construction equipment? And for a project that shouldn't be happening in the first place? We really don't need methane gas for our energy future. It will only encourage fracking and climate change, and we should be going to renewables instead.

IND113-7

Page 1

- IND113-1 Comment noted. Impacts on marine mammals are discussed in Section 4.5.2.2 of the EIS.
- IND113-2 Comment noted. Impacts on threatened and endangered species are discussed in Section 4.7 of the EIS. See the response to comment CM1-85 regarding the potential for resuspension of contaminated sediments in the water column.
- IND113-3 Comment noted. Impacts on EFH are discussed in Sections 4.6.3 through 4.6.6 of the EIS.
- IND113-4 Comment noted. Impacts on benthic species are discussed in Sections 4.5.2.1, 4.5.3.2, 4.6.3.2, 4.8.4.1, and 4.9.6 of the EIS. Impacts on benthic species due to maintenance operations once every seven years are discussed in Section 4.5.3.2 of the EIS.
- IND113-5 Comment noted. Impacts on birds are discussed in Sections 4.5.2.3, 4.5.2.4, 4.5.3, 4.7.1.5, and 4.7.5 of the EIS. Pipeline operations are not expected to effect birds. Emissions associated with operation of the M&R facility, including fugitive emissions, are discussed in Section 4.11.1 of the EIS.
- IND113-6 Comment noted.
- IND113-7 Comment noted. Renewable energy alternatives are discussed in Section 3.2.2 of the EIS.

IND114 – Katie Issel Pitre

20131206-5052(28963390).txt

IND114-1 Katie Issel Pitre, Brooklyn, NY.
Please do not go ahead with the pipeline project. Methane gas is not a stable solution to our energy consumption. The effects the project will have to the bottom sea floor dwelling communities, larger mammals and sea bird populations will have long term if not permanent damaging effects. The pipeline runs through a state park! The very symbol for preserving natural spaces for plants animals and humans alike. Please do not go ahead with this project. As Americans our example is magnified across the globe. Let it be one of preservation and innovation, not destruction and impulsivity.

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IND114-1

Your opposition to the Rockaway Project is noted. Impacts on wildlife are discussed in Sections 4.5, 4.6, and 4.7 of the EIS. The Rockaway Project would not impact state park land.

IND115 – Emily Hegarty

20131206-5069(28963956).txt

IND115-1 Emily Hegarty, Brooklyn, NY.
I am writing to ask that you STOP the project that will route a gas pipeline through the Rockaways in New York City. It is unfathomable that anyone is even considering running a toxic and unstable pipeline through such an environmentally fragile and densely residential area. This pipeline will be one bad hurricane or evil terrorist plot away from causing untold death and destruction not only in the communities of the Rockaways but in the busy shipping lanes of New York City Harbor generally. The plan to put a pipeline in this location is unfathomably stupid, unless this is just about corporate profits. If FERC has any actual oversight power, and if the government is not entirely a tool of the corporate overlords, if anyone actually cares about the lives of humans and the health of the environment, you will stop the Rockaways pipeline.

Page 1

IND115-1

Comment noted. Impacts on the environment are discussed throughout the EIS. See the responses to comments CM1-8, CM1-53, and CM1-79.

IND116 – Barbara Pearson

Ms. Bose:

IND116-1 Further to my comment of December 5, 2013, I submit the following timeline showing that from the date of the original pre-file, where the hangars have not even been presented as an alternative, until the use of the hangars for the M&R station first appears in the FERC-required NEPA compliance resource reports, the use of hangars 1 and 2 at Floyd Bennett Field has not been included in the NEPA process until after an informal decision by NPS to lease hangars has been made.

As early as September 2010, fully a year and a half before the leasing of the hangars appears in the FERC-required NEPA compliance resource reports, the leasing of the hangars at Floyd Bennett Field has already been informally agreed to by NPS. At that time NPS and Transco agreed to work together to site the M&R and Transco believes that there will be progress "very soon." The optimism in Transco's project report and expressed in FERC's teleconference minutes immediately follows their meeting with NPS in September 2010. The only proposed new siting of the M&R to come out of this cooperation between NPS and Transco is to lease the hangars for the M&R and so it follows that the informal agreement occurred in September 2010 and was the source of Transco's optimism. From this point forward, the eventual inclusion of the leasing of the hangars in FERC's NEPA process is nothing more than justification of a decision that has already been made, which NPS's DO-12 manual also states is prohibited:

Usually if a plan or project is so specific that it is the only reasonable option, this means you have waited too long to begin NEPA, because all of the important decisions have been made without benefit of environmental analysis. In this case, you may be violating NEPA by using the process "to rationalize or justify decisions already made" (1502.5).

NPS had already entered the proposal stage by April, 2011. Yet it takes nearly a year for the hangars as an alternative - the preferred alternative no less - to appear in the FERC-required NEPA compliance resource reports. Again, the DO-12 handbook states:

NEPA is the environmental component of agency planning. Under the CEQ regulations, it is to be integrated with other planning "at the earliest possible time to insure planning and decisions reflect environmental values" (1501.2). The NEPA process is always triggered at the "proposal" stage, or when an agency is considering a goal and is "actively pursuing different means of

IND116-1

One of the purposes of the pre-filing process is to identify and begin the process of evaluating potential alternatives for review in the NEPA document. The FERC's review of potential alternative sites for the M&R facility began shortly after the pre-filing process was initiated and continued through the preparation of the draft EIS. Section 3.5 of the EIS provides an analysis of five potential alternative sites for the M&R facility, and compares those sites to Transco's preferred site, which is at Hangars 1 and 2 at Floyd Bennett Field. Transco's discussions with the NPS from 2010 through 2012 were necessary to determine the feasibility of using the hangar complex as a potential site for the M&R facility. Transco had similar discussions with the NPS about other alternative sites. The NPS has not at this time issued a lease to Transco nor has it decided to issue a lease to Transco to use the hangars. The NPS will not make a decision whether to issue a lease to Transco until after the NEPA review is completed. We also note that any decisions made by the NPS are not binding on the Commission and vice versa. See the responses to comments CM1-12 and CM1-34.

IND116 – Barbara Pearson (cont'd)

IND116-1
(cont'd)

accomplishing that goal" (40 CFR 1508.23) if implementing the goal would have environmental impacts. The proposal stage is during or immediately following the feasibility stage.

It took nearly a year for the FERC-required NEPA compliance resource reports that included the leasing of the hangars at Floyd Bennett Field as an alternative to be filed with the FERC. This could have and should have been done within weeks of the meetings on April 12th & 13th, 2011 to bring this alternative into FERC's NEPA process. This alternative, with all of its attendant structural, environmental and legal issues to assess and resolve, should have been presented to the FERC via the FERC-required NEPA compliance resource reports at that time, NOT nearly a year later after most of those issues had been worked through to a point where Transco's leasing of the hangars was not simply an alternative of any kind but the preferred alternative in the March 30, 2012 filing of the updated resource reports. How is it that Transco was able to get a bill introduced into Congress within 3 months of those meetings but could not manage to put some new text into Resource Reports 1 and 10 and file them with the FERC?

NPS informally agreed to lease the hangars outside of FERC's NEPA process and both they and Transco have been using FERC's NEPA process to justify the decision after the fact. That is a violation of NEPA as stated in NPS's own documents.

January 11, 2010	Transco states it needs to find a new M&R as the preferred site in their 2009 resource reports has been deemed not viable.
Sept 14, 2010	Teleconference summary stating NPS and Transco agree to work together to find to suitable sites for "the needed pipeline facilities". Transco expects there to be progress "very soon."
Sept 28, 2010	Teleconference - once again Transco expects progress "very soon."
Oct 8, 2010	In their project report, Transco states they attended meetings on September 14, 2010 and September 21, 2010 with the new superintendent of Gateway. It is these meetings that give Transco its expectation of progress "very soon". Here is

IND116 – Barbara Pearson (cont'd)

IND116-1 (cont'd)	
	the first indication that NPS has decided "informally" that the hangars will be leased for the M&R station.
May 5, 2011	Transco project report - This is the first time it is stated in PF09-8 that the hangars are under consideration as a site for the M&R. Meetings with NPS regarding Transco's proposal and various technical issues took place on April 12&13, 2011. NPS has clearly entered the proposal stage.
July 21, 2011	HR2606 introduced in Congress, a mere three months after Transco's meetings with NPS in April. Back in September 2010, Transco's belief that progress would be made "very soon" was clearly well informed.
March 7, 2012	Stephanie Toothman testifies before Congress March 7, 2012. She testifies before any NEPA impact analysis has been done that leasing the hangars will be a benefit to the park. Clearly a decision has been made by NPS, and not merely 23 days before Transco submitted the updated resource report.
March 30, 2012	M&R on NPS land in hangars at Floyd Bennett Field first appears in a FERC-required NEPA compliance resource report filed with FERC.

Barbara Pearson

I certify service to all parties on the service list.

IND117 – Form Letter 1 (Judith Canepa, et al.)

20131206-0009 FERC PDF (Unofficial) 12/06/2013

To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Comments for combined FERC dockets CP13-36-000 and CP13-132-000
Letter in Opposition to the Rockaway Lateral Delivery Project, and
Petition to oppose the Rockaway pipeline application

Dear Secretary Bose:

IND117-1 I write to communicate my opposition to the Rockaway Lateral Delivery Project ("Rockaway pipeline"), a high-pressure gas pipeline proposed by Transcontinental Gas Pipeline Company, LLC ("Transco") to be sited at the Rockaway shoreline and primarily within Gateway National Recreation Area, federal parkland.

New Yorkers want a safe and sustainable future for our city. We urge you to recognize the impact the Rockaway pipeline will have on all of New York City.

IND117-2 The Rockaway pipeline is a direct threat to public health and safety, as well as to marine life and wildlife habitats. It violates the founding principles of Gateway to protect its wetland and ecology. The pipeline and the gas it would carry are unnecessary, and the project wrongly invests in fossil fuel infrastructure when New York City can and should be investing in sustainable energy infrastructure.

IND117-3 The Rockaway pipeline will not bring clean energy to New York. It will carry fracked gas from the Marcellus Shale. This will drive production from shale plays upwind and upstream from New York City, and place in jeopardy the water supply and foodshed of millions. Air pollution from gas fields and emissions from the pipeline and the preposterously sited meter-and-regulating station will more than negate the purported "clean burning" advantage of gas. Furthermore, at a time when we should be doing everything we can to reduce greenhouse gas emissions, we will, in fact, be increasing them: as Cornell scientists Howarth, Santoro, and Ingraffia document in the May 2011 issue of *Climatic Change Letters*, the carbon footprint of shale gas from extraction through delivery and final use is greater than that of oil or even the dirtiest coal.

IND117-4

IND117-5 The Rockaway pipeline will not guarantee a secure source of energy to New York City. In fact, New York will be more, not less, dependent on volatile supplies and prices of fossil fuels. The massive buildout of natural gas infrastructure that is currently underway throughout the Northeast, including the government-supported push for LNG, encourages sellers of natural gas to seek the highest global bidder. For example, if the Liberty Port Ambrose is granted an LNG import license, it will be able to convert to an export facility with no further public review. This will put New York residents and businesses in competition with energy-hungry emerging markets in Asia and Europe. On the other hand, sustainable sources like wind, tide, and solar will not be subject to such price competition. Furthermore, contrary to industry hype, independent analysis and evidence emerging from older shale plays indicate that the actual amount of recoverable natural gas is anything but "unlimited." For all the cost to the public and irreversible environmental destruction resulting from investing in gas infrastructure, the supply will be short-lived. Continuing to invest in fossil energy is incompatible with the long-term survival of New York City.

Better options and technologies are available today. New York City can lead the nation by choosing sustainable energy and conservation. The city should not compromise its future by replacing one polluting fossil fuel with another.

IND117-6 I urge the Commissioners to refuse to issue the requested Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project in our city. Thank you.

Signature: *Judith Canepa* Printed Name: JUDITH CANEPA
Address: 716 East 11th Street, New York, NY 10003 Date: 11/15/13

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SECRETARY OF THE
COMMISSION
2013 DEC -6 P 2:38
FEDERAL ENERGY
REGULATORY COMMISSION

IND117-1 Your opposition to the Rockaway Project is noted.

IND117-2 Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS. Impacts on marine species and wildlife habitats are discussed in Sections 4.5, 4.6, and 4.7 of the EIS. The purpose and need for the Rockaway Project is discussed in Section 1.1 of the EIS. Renewable energy alternatives are discussed in Section 3.2.2 of the EIS.

IND117-3 See the response to comment CM1-6.

IND117-4 GHG emissions are discussed in Section 4.11.1.4 of the EIS. Gas emissions from upstream production are not the subject of this EIS, and this issue is not directly related to the Projects. See the response to comment CM1-68.

IND117-5 The overall effects of the Projects on the price of natural gas have not been studied. However, the Projects would provide a new incremental supply of natural gas to the New York City market area to meet current and projected demand, which could help moderate natural gas prices in the New York City area. The export of LNG is not the subject of this EIS, nor is the issue directly related to the Projects. Renewable energy alternatives are discussed in Section 3.2.2 of the EIS.

IND117-6 Your opposition to the Rockaway Project is noted.

IND118 – Charlotte Phillips

20131209-5001(28966999).txt

Charlotte Phillips, Brooklyn, NY.
 IND118-1 I am a Board-certified pediatrician, and for that reason I am particularly concerned about the exposure of children to radon in increased amounts from fracked gas delivered in to the home.
 All gas extracted from shale contains radon, an inert radioactive gas which can cause lung cancer. Radon mixes with the methane in what we call "natural" gas and travels through delivery pipelines.
 Radon is the leading cause of lung cancer in non-smokers. Lung cancer is the most common cancer for both men and women, and its 5-year survival rate is the lowest among all cancers. The cancer risk from radon increases when exposure is repeated and more spread out over time, even if the exposure is at very low levels.
 Radon decays to equally radioactive and dangerous "progeny," including polonium and radioactive lead, before decaying to regular, non-radioactive lead. When radon is breathed in, the radon itself is exhaled, but the radon progeny deposits in the lungs, where it causes cancer. Because radon is a "heavy" gas, it tends to gravitate towards the floor, making it a particular danger for children and pets.
 Radon progeny can also plate out on the sides of gas pipes, creating "hot" radioactive pipes which are an exposure hazard, and a problem for disposal.
 In 1986, the EPA set a limit for exposure to radon in air at 4 picocuries per liter. However, because of increased exposure to many other kinds of radiation in today's world, both Johns Hopkins University and the World Health Organization have indicated that 2.7 picocuries per liter would be a better standard. But the fact is that there is no truly safe level of exposure.
 IND118-2 In the past, the natural gas used in this region was sourced from the Gulf Coast. Such gas has been found to average approximately 5 picocuries of radon per liter at the wellhead. But the Rockaway Pipeline, according to Williams Transco's own statements, will also bring us gas from the Marcellus shale, which lies under Pennsylvania, Ohio and New York. This gas when it is delivered in to the home is much more radioactive than gas coming from the Gulf Coast. Studies at wellheads in the Marcellus are very limited, but have shown the potential for as much as 150 picocuries per liter at the wellhead. Suffice it to say that people within the industry use the radioactivity of the Marcellus Shale as a "marker" to distinguish it from gas from other locations!
 Radon levels in NYC apartments will become higher as the proportion of Marcellus gas in our supply increases. Because this source is much physically closer to New York also means that the radon has less time to decay in transit. Radon has a half-life (loses half of its radioactivity) of 3.85 days. Gas from the Gulf Coast takes 4-8 days to reach New York City, but gas from the Marcellus, which is so much more radioactive to start with, would get here much faster, in less than a day. So this makes it even more likely that we will be exposed to gas with dangerous levels of radon.
 IND118-3 NYC kitchens are particularly vulnerable to radon buildup, since many of these kitchens are small, and may not have windows or hoods venting to the outside. When internal "passive" wall vents exist in apartments, people often seal them to avoid cooking odors from neighbors. And during the winter, when windows are most likely to be closed, the demand for gas is highest, and so it is delivered at a faster rate with even less time for radioactivity to decay. Also, many NYC gas stoves, especially in low-income neighborhoods, still have old fashioned "pilot lights" which result in 24/7 exposure to gas.
 Voluntary citizen radon testing over the past two years has shown that NYC kitchens typically have radon levels less than .3 picocuries per liter. We want to keep it that way! But with radioactive Marcellus Shale gas coming to NYC from both the Rockaway Pipeline, and the Spectra Pipeline into Manhattan, it has been estimated that an additional 30,000 deaths from lung cancer could result. Assemblywoman Linda Rosenthal considers this to be such a threat to New Yorkers' health that she introduced a bill, A 6863, which would require suppliers of natural gas to guarantee that gas delivered to NYC does not contain unacceptable levels of radon.
 Additionally, it is known that methane pipelines are subject to enormous amounts of leakage, so the general public may be exposed to radon even while outside of our homes.

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IND118-1 See Section 4.11.1.5 of the EIS and the responses to comments CM1-21 and CO11-23.

IND118-2 See Section 4.11.1.5 of the EIS and the responses to comments CM1-21 and CO11-23.

IND118-3 See Section 4.11.1.5 of the EIS and the responses to comments CM1-21 and CO11-23.

IND118 – Charlotte Phillips (cont'd)

20131209-5001(28966999).txt
IND118-3 The FERC draft EIS only tells us what we already know: that the radon will decay
(cont'd) (even though we know that it will arrive from the Marcellus in less than a day, less
than the 3.8 day half-life). Although venting will reduce exposure, many kitchens
have neither windows nor functioning vents. The draft EIS has no plan for monitoring
the radon level in people's homes, or for what it would do if increasing levels are
found.

IND119 – Harvey Klatzko

20131209-5003 FERC PDF (Unofficial) 12/6/2013 8:24:53 PM

IND119-1 | Harvey Klatzko, Brooklyn, NY.
An innate fear of something really bad happening with this pipe line is my main concern. Accidents do happen, and if one happens in this area, it could have a devastating effect on the environment.

IND119-1 Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS.

IND120 – Paul Manson

20131209-5004 FERC PDF (Unofficial) 12/6/2013 9:46:40 PM

IND120-1 Paul Manson, Brooklyn, NY.
Floyd Bennet Field is a very historic site within the metro area of NYC. It contains several historic buildings and hangars. A gasline through this area could greatly damage all of this. Many residents use this area for fishing, birdwatching, camping, biking, and boating. All of this will be put in jeopardy if this gasline is built. All of the fragile ecosystems in this area may suffer damage. I would not even want to think of the damage that would occur if a rupture of this gasline were to occur.

IND120-1

Comment noted. Impacts on historic resources, including the hangars, are discussed in Section 4.10.1 of the EIS. Impacts on land uses are discussed in Section 4.8 of the EIS. Impacts on ecosystems are discussed in Sections 4.2 through 4.7 of the EIS.

IND121 – Marie Argeris

20131209-5007 FERC PDF (Unofficial) 12/7/2013 11:48:27 AM

IND121-1 Marie Argeris, New York, NY.
I am very concerned about the environmental impact of the planned Rockaway pipeline extension. The fact that it is being placed in Jamaica Bay wetlands and that Transco has serious safety violations in the past, including seeking an exemption to the 1972 Marine Mammals act makes me very worried that the plan has not been studied adequately. As a beach goer and sailor I believe this may well be an environmental disaster and that there are safer methods to providing New Yorkers with clean energy. Thank you.

IND121-1

Your opposition to the Rockaway Project is noted. The Rockaway Project would not impact Jamaica Bay wetlands. Pipeline safety incidents, including incidents on Transco's system, are discussed in Section 4.12.2 of the EIS. Transco's request for an IHA under the Marine Mammal Protection Act (MMPA) is discussed in Section 4.5.2.2 of the EIS. Land use impacts are discussed in Section 4.8 of the EIS.

IND122 – Kenneth Gale

20131209-5008 FERC PDF (Unofficial) 12/7/2013 2:53:49 PM

Kenneth Gale, New York, NY.

IND122-1

The success of the Save the Whales movement has slowed activism in that issue. That said, I don't want to see one of the rarest of whales die in order to build that movement and I hope no one in FERC does, either. The Atlantic Right Whale has been on the way to being a conservation success story and one accident from a pipeline or LNG plant could undo years of success and make FERC and the United States the target of a renewed Save the Whales campaign.

The same thing would happen with the sea birds that an accident would kill.

Accidents ALWAYS happen. There isn't an oil rig in the Gulf of Mexico that hasn't leaked or spilled or worse. It's only a matter of time.

The lawsuits that would come out of dead Right Whales or seabirds or loss of tourism is not worth the money that a handful of oil companies would make. I have heard that your budget relies on approving projects. Think beyond the approval process!

Thank you.

IND122-1

Comment noted. Impacts on right whales are discussed in Section 4.7.1.1 of the EIS. Impacts on birds are discussed in Sections 4.5.2.3, 4.5.2.4, 4.5.3, 4.7.1.5, and 4.7.5 of the EIS.

IND123 – Anne Bassen

20131209-5010 FERC PDF (Unofficial) 12/7/2013 4:56:35 PM

IND123-1 Anne Bassen, Brooklyn, NY.
I would like FERC to halt the construction of The Williams Transco Rockaway Pipeline project also because the construction area is within the essential fish habitat for thirty nine fish species, including flounder, monkfish, bluefish and other fish that we eat. I would like FERC to protect these fish species from the Rockaway Pipeline for many reasons, one is that these fish are eaten, and therefore, fishermen and consumers will be adversely affected by the loss of these fish.

IND123-1 Comment noted. Impacts on EFH are discussed in Sections 4.6.3 through 4.6.6 of the EIS. Impacts on fisheries are discussed in Sections 4.8.4.1 and 4.9.6 of the EIS.

IND124 – Leyana Dessauer

20131209-5011 FERC PDF (Unofficial) 12/7/2013 7:14:22 PM

IND124-1 Leyana Dessauer, Bronxville, NY.
I urge you to ban the Rockaway Delivery Lateral Project, because it's impact on the environment will be detrimental. Spills, leaks, explosions and water contamination are all likely to occur if Rockaway is permitted.

IND124-1

Your opposition to the Rockaway Project is noted.

IND125 – Eleanor Preiss

20131209-5012(28967248).txt

Eleanor Preiss, Brooklyn, NY.
IND125-1 Obviously it is inadvisable to construct a "natural" gas pipeline through a NYC's only National Park. Obviously it does not make sense to route such a pipeline where so many persons and wildlife will be placed in danger from pollution, possible explosions, fire, radon. To add proposed insult to proposed injury, the
IND125-2 Williams/Transco company is now pushing to have the construction of the Rockaway Lateral Pipeline occur in the summer, rather than the winter as described in the dEIS. The dEIS must be based on the actual construction season because of the entirely different effects on wildlife and on people using the park.
Brooklyn and Queens are very dense areas. Many many persons rely on Floyd Bennett Field, Riis Beach and the GNRA as a whole for some fresh air and space. If the construction occurs in the summer not only will be some of the Beach be closed off, but the rest of it will be affected by the noise and the pollution of the water and air. Many persons will be left without a chance to get away from small apartments and small rooms. Vendors and businesses nearby will see their profits plummet. Spring, summer or fall construction of the M & R station at FBF will negatively affect the gardeners who are very close to Hangers 1 & 2. (As a side note, is it smart to locate an M & R station and the National Grid portion of the pipeline so close to a heavily traveled highway and bridge???)

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IND125-1

Your opposition to the Rockaway Project is noted. Impacts on the GNRA are discussed in Section 4.8.7 of the EIS. Impacts on wildlife are discussed in Sections 4.5 through 4.7 of the EIS. Land use impacts are discussed in Section 4.8. Pipeline safety is discussed in Section 4.12 of the EIS. See the response to comment CM1-21.

IND125-2

Comment noted. See the responses to comments CM1-14 and CM1-146. Noise from the HDD, including noise from both the onshore entry pit and the offshore exit pit, is not expected to be audible at Rockaway Beach. Economic impacts from the Rockaway Project are discussed in Section 4.9.6 of the EIS. No impacts from traffic along Flatbush Avenue to the M&R facility are anticipated. The Commission has no jurisdiction over the siting of the BQI pipelines.

IND126– Eleanor Preiss

20131209-5013(28967249).txt

IND126-1 Eleanor Preiss, Brooklyn, NY.
During the project review process, Williams/Transco sought an exemption to the 1972 Marine Mammal Protection Act. In addition, W/T has applied to the National Marine Fisheries Service for "Incidental Harassment Authorization" for seven marine mammals.

As far as I am concerned, those two items are enough to disallow the construction of the Rockaway Lateral Pipeline. I am particularly incensed that the North Atlantic Right Whale is among the seven mammals, and that the dEIS says they "may be affected" by the construction (let alone the pipeline after construction.) The North Atlantic Right Whale is bordering on extinction. There are an estimated 400 to 450 individuals remaining. The possibility of the construction occurring in the spring, summer or fall is particularly horrendous as they wend their way from the southeast US coast to the Stellwagen Bank and back. They will be particularly endangered by the noise of the trenching equipment (which can screw up their ability to navigate), collisions with equipment, and the stirring up of 38 acres of seabed and the resulting pollution and floating debris. For all of our sakes, please protect the North Atlantic Right Whale, and do not allow the construction of this pipeline.

Page 1

IND126-1

Comment noted. Transco's request for an IHA under the MMPA is discussed in Section 4.5.2.2 of the EIS. Impacts on right whales are discussed in Section 4.7.1.1 of the EIS.

IND127 – Betty Winkler

20131209-5014(28967252).txt

IND127-1 Betty Winkler, New York, NY.
The impacts on the surrounding ecosystem are one giant reason why the Rockaway Pipeline should not be approved, and should not be built. No matter the words of Williams Transco re: attempts at "mitigation" of potential impacts on numerous wildlife species, the science is not there proving that their pipeline construction and its ongoing operations would not destroy this vital ecosystem. It is vital commercially and environmentally. Do not be complicit in this destruction of multiple species and life as we know it in New York. Do not give a single permit for the Rockaway pipeline.

Page 1

IND127-1

Your opposition to the Rockaway Project is noted. See the response to comment CO11-33.

IND128 – Jonathon Cole

20131209-5016(28967256).txt

IND128-1 Jonathan Cole, Brooklyn, NY.
I would like to state my strong opposition to the construction of this pipeline for many reasons. But the two most concerning reasons are as follows:

1. construction will cause damage to the natural ecosystem in spite of there being no "need" for new delivery systems in the NYC area. This pipeline will cause irreversible damage to the environment. Williams Transco has already lobbied for the "right" to harm gray seals, harbor seals, harp seals, the North Atlantic right whale, bottlenose dolphins, harbor porpoises, and short-beaked common dolphins. This, in addition to the physical damage to the wetlands is reason enough to prohibit construction of this pipeline.

IND128-2 2. According to Transcos own statements, this pipeline will bring us gas from the Marcellus Shale, which lies under Pennsylvania, Ohio and New York. This gas from toxic fracking practices has high levels of radioactivity from Radon. Studies at wellheads in the Marcellus are very limited, but have shown the potential for as much as 150 picocuries per liter at the wellhead. This is orders of magnitude higher than what is legally considered safe levels of radon exposure. With this radioactive Marcellus Shale gas coming to NYC from both the Rockaway Pipeline, and the Spectra Pipeline into Manhattan, it has been estimated that an additional 30,000 deaths from lung cancer could result. Current radon levels tested in kitchens in Manhattan and the 5 boroughs is 0.3 picocuries! We wish to keep it that way. I DO NOT WANT TO BREATHE RADON period, even 0.3 picocuries!!!
STOP THIS PIPELINE!!

Page 1

IND128-1

Your opposition to the Rockaway Project is noted. Impacts on natural resources are discussed throughout the EIS. Impacts on marine mammals and Transco's request for an IHA under the MMPA are discussed in Section 4.5.2.2 of the EIS. Transco's proposed use of the HDD method to cross under Rockaway Beach would avoid impacts on wetlands.

IND128-2

See Section 4.11.1.5 of the EIS and the responses to comments CM1-21 and CO11-23.

IND129 – Robin Ginsburg

20131209-5017(28967258).txt

IND129-1 Robin Ginsburg, Brooklyn, NY.
A pipeline would precipitate more fracking and further contribution to global warming. I Love the beach and do not want it destroyed...if only we could still go swimming in the Hudson.

Page 1

IND129-1

Comment noted. GHG emissions are discussed in Section 4.11.1.4 of the EIS. The Rockaway Project would not impact the Hudson River. See the responses to comments CM1-6 and CM1-146.

IND130 – Eleanor Preiss

20131209-5018(28967260).txt

Eleanor Preiss, Brooklyn, NY.

IND130-1 I would like FERC to set a new precedent and look at the cumulative effects of pipelines rather than approving them a few miles at a time. There are two ways of looking at this. One is to look at the total effect of what will be carried by, for instance, the Rockaway Lateral Pipeline from fracking to delivery. Yes, natural gas is "cleaner" when burned than coal or oil, but the cumulative effect, given the emissions of the equipment building the roads, delivering the water, drilling, and removing the waste must be factored in. The loss of water by poisoning and air by pollution must be factored in. The radon delivered by this gas from the Marcellus shale and the future health problems associated with all these activities must be factored in.

IND130-2 The second way to look at the cumulative effects is to look at the extent of the pipeline buildout in our immediate area and in the Northeast. The fact that the National Grid part of this pipeline somehow slid by without approval is a serious problem that needs to be addressed. New York City has just been assaulted by the Spectra pipeline coming in to Manhattan, carrying fracked gas. The proposed Rockaway Lateral would compound this problem. In addition, the massive pipeline buildout in the northeast region is committing the country to fossil fuel for a long time to come. If the pipes are built, the gas will be fracked to fill them. Fracking natural gas is not a bridge to renewables. It is more of the same and will lead us even further down the road to climate disaster.

IND130-3 I am asking FERC, again, to look at the cumulative effects of your actions, and as a good start, disallow the Rockaway Lateral Pipeline.

Page 1

IND130-1 Comment noted. Cumulative impacts are discussed in Section 4.13 of the EIS. See the responses to comments CM1-6 and CM1-21.

IND130-2 Comment noted. See the responses to comments CM1-41 and CM1-56. Pipeline buildout in the Northeast region and hydraulic fracturing are not the subjects of this EIS, and these issues are not directly related to the Projects.

IND130-3 Your opposition to the Rockaway Project is noted.

IND131 – Jennifer Kline

20131209-5019(28967261).txt

IND131-1 Jennifer Kline, Woodside, NY.
I am writing to state my opposition to the Rockaway Lateral Delivery Project, DOCKET NUMBER, CP13-36-000. I strongly oppose the construction of this project due to the dangers it poses to our community and environment.
Large scale natural disasters are incredibly likely in the future and the construction of this pipeline is an unnecessary environmental disaster waiting to happen.
The potential of Radon exposure is very real and very hazardous. Our community, our beaches, our national parks are not intended to be used for this type of construction.
As a resident of Queens, New York, I reiterate my strong opposition to the development of this gas pipeline in our National Park.
Best,
Jennifer Kline

Page 1

IND131-1

Your opposition to the Rockaway Project is noted. Pipeline safety is discussed in Section 4.12 of the EIS. Impacts on land uses are discussed in Section 4.8 of the EIS. See the response to comment CM1-21.

IND132 – Jeremy Jones

20131209-5020(28967264).txt

IND132-1 Jeremy Jones, Rockaway Beach, NY.
I am very concerned about the proposed gas pipeline, DOCKET NUMBER, CP13-36-000 that will run under the seafloor of the Atlantic Ocean, Jamaica Bay and terminating in Floyd Bennett Field.

As a recreational angler who regularly fishes in both the ocean and the bay, I have seen the continued improvements in both the numbers and variety of fish and other aquatic mammals that migrate through our coastal waters throughout the year. The massive dredging project that is being proposed to occur during the Summer months when these waters are most active with marine life and humans alike, is absolutely unacceptable to the residents and visitors that cherish our natural surroundings.

How such a venture with commercial profits at its' core can be considered on Federal parkland is beyond me.

I understand the need for diverse energy sources, but running a pipeline through an area that is so vulnerable to dangerous storm events, and in the immediate vicinity of so many people is unwise if not downright crazy.

You can be assured that there will be massive public resistance by residents in all manner of watercraft out on the water to voice our united disapproval of this proposal.

I

IND132-1

Your opposition to the Rockaway Project is noted. Impacts on marine wildlife are discussed in Sections 4.5 through 4.8 of the EIS, and impacts on fisheries are discussed in Sections 4.8.4.1 and 4.9.6 of the EIS. See the response to comment CM1-8.

IND133 – Form Letter 2

20131206-0009 FERC PDF (Unofficial) 12/06/2013

To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

cc: All appropriate government officials, current and future

RE: Comments for combined FERC dockets CP13-36-000 and CP13-132-000
Letter in Opposition to the Rockaway Lateral Delivery Project, and
Petition to oppose the Spectra pipeline application

Dear Secretary Bose:

I write to communicate my opposition to the Rockaway Lateral Delivery Project (the Rockaway Pipeline), a high-pressure gas pipeline proposed by Transcontinental Gas Pipeline Company, LLC ("Transco" or Williams Transco) to be sited at the Rockaway shoreline and primarily within Gateway National Recreation Area, federal parkland.

I ask you to recognize the many harmful and unwanted impacts of the Rockaway Pipeline.

IND133-1 This project is unsafe. A pipeline on the ocean floor off of Sandy is an invitation to disaster. Cars were piled on top of each other by the force of the waves, this could be disturbed by another major storm and broken. Also these pipelines would be targets for terrorists - easy targets in heavily populated areas.

IND133-2 If there was a major or even a series of minor spills it would impact beaches which are an integral recreational and scenic resource for the largest urban area in the U.S.

IND133-3 I urge the Federal Energy Regulatory Commission to refuse to provide the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project in our city.

Thank you.

Respectfully,

Signature George Happel Printed Name George Happel

Address 2415 MORRIS AVE., B53, BRONX, N.Y. 10468

Email address Forehap@gmail.com Date 11/16/13

FILED
SECRETARY OF THE
COMMISSION
2013 DEC -6 P 2:31
FEDERAL ENERGY
REGULATORY COMMISSION

- IND133-1 Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS. See the response to comment CM1-8.
- IND133-2 Comment noted. See the responses to comments CM1-53 and CM1-79.
- IND133-3 Comment noted. The pipeline would carry natural gas, not a liquid. No impacts on Rockaway Beach are expected during construction or operation of the Rockaway Project. See the response to comment CM1-146. Pipeline safety is discussed in Section 4.12 of the EIS.

IND133 – Form Letter 2 (cont'd)

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To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

cc: All appropriate government officials, current and future

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Letter in Opposition to the Rockaway Lateral Delivery Project, and
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FILED
SECRETARY OF THE
COMMISSION
2013 DEC -6 P 2:36
FEDERAL ENERGY
REGULATORY COMMISSION

Dear Secretary Bose:

I write to communicate my opposition to the Rockaway Lateral Delivery Project (the Rockaway Pipeline), a high-pressure gas pipeline proposed by Transcontinental Gas Pipeline Company, LLC ("Transco" or Williams Transco) to be sited at the Rockaway shoreline and primarily within Gateway National Recreation Area, federal parkland.

I ask you to recognize the many harmful and unwanted impacts of the Rockaway Pipeline.

IND133-4 Biggest fear is an environmental disaster - use of renewable energy is the only viable way to go - solar wind -

I urge the Federal Energy Regulatory Commission to refuse to provide the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project in our city.

Thank you.

Respectfully,

Signature [Signature] Printed Name HARVE T. KLATZKO

Address 333 McHenry Ave JMKYN NY 11218

Email address HARVE.KLATZKO@GMAIL.COM Date 11/15/13

IND133-4

Comment noted. Renewable energy alternatives are discussed in Section 3.2.2 of the EIS.

IND133 – Form Letter 2 (cont'd)

20131206-0009 FERC PDF (Unofficial) 12/06/2013

To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

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SECRETARY OF THE
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2013 DEC -6 P 2:37
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REGULATORY COMMISSION

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I ask you to recognize the many harmful and unwanted impacts of the Rockaway Pipeline.

IND133-5

IND133-6

IND133-7

This project will encourage fracking, which has been shown to contaminate water and air, trigger earth quakes, and expose people to radioactive materials. We don't need to use natural gas, which will exacerbate climate change, because we can meet all our energy needs with renewable energy like solar and windpower. Gas pipelines are prone to explosion, and are an extreme safety hazard. We don't need them in our national park.

I urge the Federal Energy Regulatory Commission to refuse to provide the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project in our city.

Thank you.

Respectfully,

Signature  Printed Name Edith Kantrowitz
Address 333 McDonald Avenue - #5D, Bklyn NY 11218
Email address ~~reweaving~~ @hotmail.com Date 11/15/13

IND133-5

See the response to comment CM1-6.

IND133-6

Renewable energy alternatives are discussed in Section 3.2.2 of the EIS.

IND133-7

Pipeline safety is discussed in Section 4.12 of the EIS.

IND133 – Form Letter 2 (cont'd)

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888 First Street NE, Room 1A
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I ask you to recognize the many harmful and unwanted impacts of the Rockaway Pipeline.

IND133-8

Renewable energy is better than convergent at such destructively
coupled energy. It draws the fossil gas from the
destructive outrageous Billionaire wildcatters, asking
to profit before people. What you start extracting
your amounts of energy from the earth you spent
the climate tipping point along with the gas
calculator swelling things of folds like diamonds take
what occurred in the Philippines which took over 12,000 years.
Fossil fuels infrastructure included convergent wastewater
and chemical destruction, ~~and~~ the first system using
and fire, water supplied, and water, and from the ground
in H₂O, well digging which a drilling which releases
polluted energy convergences to return surface. There is a few of the
Lump the Federal Energy Regulatory Commission to refuse to provide the requested but unanswered
problems

I urge the Federal Energy Regulatory Commission to refuse to provide the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project in our city.

Thank you.

Respectfully,

Signature  Printed Name Jonathan Rubin

Address 588 West End Avenue, NYC 10024

Email address nicolubio@nubio.com Date 11/12/13

IND133-8

Renewable energy alternatives are discussed in Section 3.2.2 of the EIS. The Projects would not involve hydraulic fracturing. See the responses to comments CM1-6 and CM1-8.

IND133 – Form Letter 2 (cont'd)

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888 First Street NE, Room 1A
Washington, DC 20426

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I ask you to recognize the many harmful and unwanted impacts of the Rockaway Pipeline.

IND133-9

There is so much that can go wrong with this pipeline. Accidents of explosions or even just leaks of gas from pipelines are predictable and well documented.

IND133-10

The negative impact on marine sea life including protected endangered whales, turtles and fish is being disregarded by those profiting from the globalization of fossil fuel infrastructure. A society can be judged by how it treats those that can't protect themselves. That includes our children's future, our elderly and ^{negative effects on} animals, fish & birds.

I urge the Federal Energy Regulatory Commission to refuse to provide the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project in our city.

Thank you.

Respectfully,

Signature  Printed Name Donna Stein
Address 162 W 54 St NY NY 10019
Email address onnaday@mail.com Date 11/15/13

IND133-9

Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS.

IND133-10

Comment noted. Impacts on wildlife are discussed in Sections 4.5 through 4.7 of the EIS.

IND133 – Form Letter 2 (cont'd)

20131206-0009 FERC PDF (Unofficial) 12/06/2013

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Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

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I ask you to recognize the many harmful and unwanted impacts of the Rockaway Pipeline.

IND133-11

HIGH PRESSURE PIPELINES TEND TO EXPLODE MORE OFTEN THAN LOW PRESSURE PIPELINES, WHICH ALSO BLOW UP. WE ALREADY DO WITHOUT THE GAS, SO WE OBVIOUSLY DON'T NEED IT.

IND133-12

HIGH PRESSURE PIPELINES HAVE A TENDENCY TO LEAK, AND THAT WOULD IMPACT SHORE AND BEACH TOURISM.

IND133-13

THESE PIPES INCLUDE METHANE, A GREENHOUSE GAS WORSE THAN CARBON DIOXIDE, SO THERE IS AN ENVIRONMENTAL IMPACT

I urge the Federal Energy Regulatory Commission to refuse to provide the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project in our city.

Thank you.

Respectfully,

Signature Ken Gale Printed Name KEN GALE
Address 220 E. 85th ST, NEW YORK, NY 10028
Email address NUFFSAID@RISEUP.NET Date Nov. 15, 2013

IND133-11

Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS. The purpose and need for the Projects are discussed in Section 1.1 of the EIS.

IND133-12

Comment noted. No impacts on Rockaway Beach are expected during construction or operation of the Rockaway Project. See the response to comment CM1-146. Pipeline safety is discussed in Section 4.12. of the EIS

IND133-13

See the response to comment CM2-13.

IND133 – Form Letter 2 (cont'd)

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I ask you to recognize the many harmful and unwanted impacts of the Rockaway Pipeline.

IND133-14

*Pipeline may blow up, like what
happened in Texas and a big mess like
in the Gulf of Mexico.
Please stop the pipeline before
it is too late to turn back from the
most biggest mistake.*

I urge the Federal Energy Regulatory Commission to refuse to provide the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project in our city.

Thank you.

Respectfully,

Signature *[Signature]* Printed Name *Corbo Vazquez*
Address *31-21 54 ST #5J Woodside, NY 11377*
Email address *None* Date *11/15/13*

IND133-14

Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS.

IND133 – Form Letter 2 (cont'd)

20131206-0009 FERC PDF (Unofficial) 12/06/2013

To: Kimberly D. Bose, Secretary
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888 First Street NE, Room 1A
Washington, DC 20426

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I ask you to recognize the many harmful and unwanted impacts of the Rockaway Pipeline.

IND133-15

Action now will help generations
to come.

I urge the Federal Energy Regulatory Commission to refuse to provide the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project in our city.

Thank you.

Respectfully,

Signature Fred J. Berg Printed Name FREDDIE J. BERG
Address 457 FDR DRIVE, # 2001, NY, NY 10002
Email address FRED.BERG@OUTLOOK.COM Date 11/15/2013

IND133-15

Comment noted.

IND133 – Form Letter 2 (cont'd)

20131206-0009 FERC PDF (Unofficial) 12/06/2013

To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

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I ask you to recognize the many harmful and unwanted impacts of the Rockaway Pipeline.

IND133-16

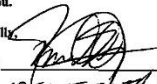
THE PROJECT WILL EXACERBATE CLIMATE CHANGE.
ESSENTIAL FISH HABITATS WILL BE DESTROYED.
FIRE AND FLOOD HAZARD EXISTS AT THE SITE OF
THE METERING STATION.

I urge the Federal Energy Regulatory Commission to refuse to provide the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project in our city.

Thank you.

Respectfully,

Signature



Printed Name

Paul Searcy

Address

1251 E 80TH ST, BROOKLYN N.Y. 11236

Email address

PS3LOCH3@HOTMAIL.COM

Date

11/20/13

IND133-16

Comment noted. GHG emissions are discussed in Section 4.11.1.4 of the EIS. Impacts on EFH are discussed in Sections 4.6.3 through 4.6.6 of the EIS. Pipeline safety is discussed in Section 4.12 of the EIS.

IND133 – Form Letter 2 (cont'd)

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Washington, DC 20426

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COMMISSION
2013 DEC -6 P 2:37
FEDERAL ENERGY
REGULATORY COMMISSION

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I ask you to recognize the many harmful and unwanted impacts of the Rockaway Pipeline.

IND133-17

ITS UNSAFE TO EXISTING COMMUNITIES,
IT GOES AGAINST NATURE

I urge the Federal Energy Regulatory Commission to refuse to provide the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project in our city.

Thank you.

Respectfully,

Signature Michael S. For Printed Name MICHAEL S FOR
Address 16541 PLATONDS FIRST ST BETHLEAH, PA 17815
Email address _____ Date 11-20-13

IND133-17

Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS.

IND133 – Form Letter 2 (cont'd)

20131206-0009 FERC PDF (Unofficial) 12/06/2013

To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
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I ask you to recognize the many harmful and unwanted impacts of the Rockaway Pipeline.

IND133-18

ESSENTIAL FIRST HABITATS WILL BE DESTROYED.
THE PROJECT WILL RESULT IN THE DREDGING OF
TODDERS.

IND133-19

DONT MESS W BIRDS USE OF POSSIBLE NESTS. AREA
ARE ALREADY RECEIVING A SUFFICIENT AMOUNT OF NATURAL
GAS FOR HEATING + COOKING.

IND133-20

GAS PIPELINES CAN BE PLACED DESTROYING HABITATS
+ KILLING PEOPLE.

I urge the Federal Energy Regulatory Commission to refuse to provide the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project in our city.

Thank you.

Respectfully,

Signature Vincent Edsenza Printed Name VINCENT EDSENZA
Address 1323 E 53RD ST BRKLYN NY 1123P
Email address VEDSENZA@PR20164.NC Date 11/20/13

IND133-18

Comment noted. Impacts on EFH are discussed in Sections 4.6.3 through 4.6.6 of the EIS. See the response to comment CM1-85 regarding the potential for resuspension of contaminated sediments in the water column.

IND133-19

Comment noted. The purpose and need for the Projects are discussed in Section 1.1 of the EIS.

IND133-20

Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS.

IND133 – Form Letter 2 (cont'd)

20131206-0009 FERC PDF (Unofficial) 12/06/2013

To: Kimberly D. Bose, Secretary
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888 First Street NE, Room 1A
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I ask you to recognize the many harmful and unwanted impacts of the Rockaway Pipeline.

- IND133-21 NEGATIVE IMPACTS ON PROTECTED SPECIES + MARINE WILDLIFE ARE UNAVOIDABLE
- IND133-22 ESSENTIAL FISH HABITATS WILL BE DESTROYED
- IND133-23 THE PROJECT WILL RESULT IN THE DREDGING OF TOXINS
- IND133-24 THE PROJECT WILL ENCOURAGE FRACKING
- IND133-25 PIPELINE SAFETY: SINCE 1986, PIPELINE ACCIDENTS HAVE KILLED MORE THAN 500 PEOPLE, INJURED OVER 4,000 + COST NEARLY SEVEN BILLION DOLLARS IN PROPERTY DAMAGE.
- IND133-26 FIRE + FLOOD HAZARD EXIST AT THE SITE OF THE METERING STATION

I urge the Federal Energy Regulatory Commission to refuse to provide the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project in our city.

Thank you.

Respectfully,

Signature Patricia Vasquez Printed Name Patricia Vasquez
Address 1681 E 51 ST Brooklyn NY 11234
Email address TRAILERTRASH@AOL.COM Date 11-20-13

- IND133-21 Impacts on marine species are discussed in Sections 4.5, 4.6, and 4.7 of the EIS. Impacts on threatened and endangered species are discussed in Section 4.7 of the EIS.
- IND133-22 See the response to comment CM1-85.
- IND133-23 See the response to comment CM1-6.
- IND133-24 Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS.
- IND133-25 Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS. See the response to comment CM1-8.

IND133 – Form Letter 2 (cont'd)

20131206-0009 FERC PDF (Unofficial) 12/06/2013

To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

cc: All appropriate government officials, current and future

RE: Comments for combined FERC dockets CP13-36-000 and CP13-132-000
Letter in Opposition to the Rockaway Lateral Delivery Project, and
Petition to oppose the Spectra pipeline application

FILED
SECRETARY OF THE
COMMISSION
2013 DEC -6 P 2:37
FEDERAL ENERGY
REGULATORY COMMISSION

Dear Secretary Bose:


I write to communicate my opposition to the Rockaway Lateral Delivery Project (the Rockaway Pipeline), a high-pressure gas pipeline proposed by Transcontinental Gas Pipeline Company, LLC ("Transco" or Williams Transco) to be sited at the Rockaway shoreline and primarily within Gateway National Recreation Area, federal parkland.

I ask you to recognize the many harmful and unwanted impacts of the Rockaway Pipeline.

I urge the Federal Energy Regulatory Commission to refuse to provide the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project in our city.

Thank you.

Respectfully,

Signature  Printed Name Dionisio Payamp
Address 583 E 80th St BKlyn NY 11236
Email address _____ Date 11-20-13

IND133 – Form Letter 2 (cont'd)

20131206-0009 FERC PDF (Unofficial) 12/06/2013

To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

CC: NYC Mayor-Elect Bill de Blasio

RE: Comments on draft EIS for combined FERC dockets CP13-36-000 and CP13-132-000
(Letter in Opposition to the Rockaway Lateral Delivery Project)

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I ask you to recognize the potential harmful and unwanted impacts of the Rockaway Pipeline.

IND133-26

This pipeline will destroy our community.
It would be unsafe for our family.
Many bad things can happen with this
pipeline such as explosions and other

I urge the Federal Energy Regulatory Commission to refuse the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project.

Thank you.

Respectfully,

Signature Georges Richard Blain Printed Name Georges Richard Blain
Address 20 Baughman Pl 3C Brooklyn NY 11234 Date 11/20/13

IND133-26

Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS.

IND133 – Form Letter 2 (cont'd)

20131206-0009 FERC PDF (Unofficial) 12/06/2013

To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
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I ask you to recognize the many harmful and unwanted impacts of the Rockaway Pipeline.

IND133-27

The pipeline can rupture and leak natural gas and cause massive fires. There would be casualties and property damage. A storm like Sandy or worse would make it into an even larger disaster. Wildlife would be destroyed. It may take decades before marine life returns, if at all. Birds would also be compromised.

IND133-28

I urge the Federal Energy Regulatory Commission to refuse to provide the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project in our city.

Thank you.

Respectfully,

Signature Kenneth Korte Printed Name Kenneth Korte
Address 5022 204th St. Bayside, NY 11364
Email address KorteK428@gmail.com Date 11/15/13

IND133-27

Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS. See the response to comment CM1-8.

IND133-28

Comment noted. Impacts on wildlife are discussed in Sections 4.5 through 4.7 of the EIS.

IND133 – Form Letter 2 (cont'd)

20131206-0009 FERC PDF (Unofficial) 12/06/2013

To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

CC: NYC Mayor-Elect Bill de Blasio

RE: Comments on draft EIS for combined FERC dockets CP13-36-000 and CP13-132-000
(Letter in Opposition to the Rockaway Lateral Delivery Project)

FILED
SECRETARY OF THE
COMMISSION
2013 DEC -6 P 2:38
FEDERAL ENERGY
REGULATORY COMMISSION

Dear Secretary Bose:


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I ask you to recognize the potential harmful and unwanted impacts of the Rockaway Pipeline.

I urge the Federal Energy Regulatory Commission to refuse the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project.

Thank you.

Respectfully,

Signature  Printed Name John W. Burkett
Address 1200 E 51 St, NYC Date 11/20/2013

IND133 – Form Letter 2 (cont'd)

To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Comments on draft EIS for combined FERC dockets CP13-36-000 and CP13-132-000
(Letter in Opposition to the Rockaway Lateral Delivery Project)

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I ask you to recognize the potential harmful and unwanted impacts of the Rockaway Pipeline.

IND133-29 All these natural gas infrastructure projects are encouraging more fracking, which I believe is bad, and we need to move the funds towards renewable energy investments instead.

IND133-29

See the response to comment CM1-6. Renewable energy alternatives are discussed in Section 3.2.2 of the EIS.

IND133-30 AND MORE INFO NEEDS TO GET TO THE PEOPLE, NOBODY KNOWS THESE PROJECTS ARE EVEN HAPPENING!

IND133-30

See the response to comment CM1-1.

I urge the Federal Energy Regulatory Commission to refuse the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project.

Thank you.

Respectfully,

Signature

Address

Printed Name

Date

KEVIN G. O'NEILL
23 CAYUGA RD
SCARSDALE, NY 10583
11/6/13

IND133 – Form Letter 2 (cont'd)

To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Comments on draft EIS for combined FERC dockets CP13-36-000 and CP13-132-000
(Letter in Opposition to the Rockaway Lateral Delivery Project)

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I urge the Federal Energy Regulatory Commission to refuse the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project.

Thank you.

Respectfully,

Signature Deirdre Aherne Printed Name DEIRDRE AHERNE

Address 231 W. 120 St. NY NY 10127 Date 11/5/13

IND134 – Martha Cameron

20131209-5021 FERC PDF (Unofficial) 12/8/2013 6:52:57 PM

Martha Cameron, Brooklyn, NY.

These are some of the reasons why FERC must reject Williams Transco's application to build the Rockaway Lateral pipeline.

- IND134-1 1. There has been no proven need for an additional 100,000 dekatherms of natural gas per day in New York City. The only "evidence" provided for such a need has come from the companies that stand to profit from the use and sale of natural gas, namely, Williams Transco and National Grid, and from politicians who are also acting from self-interest: in particular, Michael Grimm, who accepted a \$3,000 campaign donation from Williams after introducing HR 2606 into the House; and billionaire Michael Bloomberg, who has massive investments in Big Energy. The evidence provided has been in the line of statements, not actual hard proof. There may be a need for more energy in New York City, but this need can - and must, in light of global warming - be satisfied through energy conservation, improved mass transit, an upgraded distribution system, and renewable energy.
- IND134-2 2. As CAPP's Maureen Healy and others have pointed out in earlier comments, an accurate assessment of the environmental impact of the 7-mile pipeline project situated in Gateway National Recreation Area (GNRA; hereafter Gateway) has been flawed since its inception by the questionable, possibly illegal, segmentation of this project between two entities, National Grid and Williams Transco. National Grid's portion of the pipeline, the Brooklyn-Queens Interconnect (BQI), has been arbitrarily treated as an "intrastate" retail supply line, even though the gas passing through its portion of the pipeline cannot be used by retail customers until it passes through Transco's metering and regulating station. This segmentation has allowed National Grid to bypass the close scrutiny of NEPA, even though (and quite possibly because) it passes directly under the environmentally sensitive Jamaica Bay Inlet.
- IND134-3 3. The project is situated in Gateway, a national park; national parks are the property of the people of the United States. If private corporations are permitted to build on public land, it follows that any profits they derive from that access rightly belong to the people. Failure to hand over said profits amounts to theft of the commons - the people's land. To date, there has been no independent valuation of Transco's (and National Grid's) access to Gateway. Without such a valuation, the public cannot properly determine whether the monies received are adequate to offset the cost to the environment of this project.
- IND134-4 4. The National Park Service (NPS) has agreed to accept money and money-in-kind from Williams Transco in exchange for the right to house a 60,000-square-foot metering and regulating station - a factory that will be a continuous source of noise, pollution, and fugitive methane emissions - in historic hangars on Floyd Bennett Field. The public has not been told how much money is involved in the siting of this factory; therefore, as with point 3, the public cannot accurately assess whether this is fair exchange for the environmental damage and loss of landmarked properties that will result from said factory. (Note: NPS went out of its way to conceal this project from its users. Why? Did it fear that the public would balk? In which case, this begs the question: in whose interest is the National Park Service acting?)
- IND134-5 5. As with any industrial project, safety is a consideration. How safe will this pipeline be? As safe as any pipeline that is transporting natural gas at very high pressure - which is to say, it will probably be fine for a couple of decades, assuming its welds hold, assuming it has been laid in place safely, assuming it is not impacted by extreme weather. But: after a few decades, pipelines start to deteriorate; not all welds are done perfectly, so leaks may go undetected for years (federal law mandates a camera inspection only once

- IND134-1 See the response to comment CM2-32. Energy conservation alternatives are discussed in Section 3.2.1 of the EIS. Renewable energy alternatives are discussed in Section 3.2.2.
- IND134-2 See the response to comment CM1-56.
- IND134-3 See the responses to comments CM1-34 and CM1-44.
- IND134-4 See the responses to comments CM1-34 and CM1-44.
- IND134-5 Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS.

IND134 – Martha Cameron (cont'd)

20131209-5021 FERC PDF (Unofficial) 12/8/2013 6:52:57 PM

IND134-5
(cont'd) every 7 years). A report prepared For Senator Markey (D-MA) notes that leaky gas pipes are costing taxpayers billions every year; there is little incentive (i.e., no profit and no fines) for corporations to adequately monitor and replace old pipes; corporations are earning billions on gas that never reaches ratepayers but simply leaks into the atmosphere – adding to climate change and the public costs associated with it. Occasionally – and more and more frequently – the pipelines explode. People die. There are lawsuits. Payouts ensue. Another cost of doing business – a tax write-off. Like the “community grants” that Williams Transco offers to buy off groups who may object to its plans. Or the “campaign contributions” to politicians. (Note: There are few clean hands in Congress. A new report by Citizens for Responsibility and Ethics in Washington [CREW] points out that 87% of all members of Congress receive campaign money from Big Gas. FERC itself is funded “through costs recovered by the fees and annual charges from the industries it regulates.” How can the people’s voice be heard against this onslaught of money?)

IND134-6 6. What’s past is prologue – so said Shakespeare in *The Tempest*. And climatologists agree: it’s bad now, and it’s going to get worse – much worse. Why, then, is anyone even considering putting this project in the very place that was utterly devastated by Hurricane Sandy? Floyd Bennett Field, where the m&r factory is to be located, is a mere 16 feet about sea level; a flood in the factory risks a catastrophic gas explosion. Category 4 Hurricane Ivan caused major mudslides on the ocean floor, causing pipelines to break and leak. Will the Rockaway Lateral, so close to shore, in so vulnerable an area, suffer a similar fate? What then will happen to the Jamaica Bay Wildlife Refuge and all its inhabitants? Will Williams Transco, like King Canute, command the seas to stop rising?

IND134-7

To be continued...

IND134-6 Comment noted.

IND134-7 Comment noted. See the response to comment CM1-8.

IND134 – Martha Cameron (cont'd)

20131209-5022 FERC PDF (Unofficial) 12/8/2013 6:54:23 PM

Martha Cameron, Brooklyn, NY.

Here are some more reasons why FERC must reject Williams Transco's application to build the Rockaway Lateral pipeline.

- IND134-8 In addition to being located in an area that will bear the brunt of future severe storms, this project is also located in three important and acutely vulnerable natural areas: Floyd Bennett Field, Jamaica Bay, and the offshore Atlantic area. These three areas together form a single ecosystem for many species. Consider:
7. Volunteer divers have created artificial reefs in the offshore area where Transco intends to trench. These reefs, which Transco initially dismissed as man-made "obstructions," are covered with northern coral and provide vital habitat to an abundance of marine life. No matter how carefully planned the construction process is, damage to this area will inevitably occur. It takes years to grow coral and we can ill afford to lose what is already there: coral reefs are the nurseries of the seas, and they are threatened the world over.
- IND134-9 Furthermore, the trenching itself will release toxic heavy metals and stir up a million cubic yards of sediment; this will also negatively impact the benthic community, with repercussions all up the food chain.
- IND134-10 8. During construction, oysters will be on the front lines. This is especially sad, and foolhardy, given that they have only very recently been restored to this area. Oysters are a tremendously important species to humans, not only as a food source, but as a bulwark against storm surge: oyster beds in sufficient quantity – that is, restored to their numbers in earlier centuries – could act as a natural sea wall against future flood damage. In addition, oysters are amazing anti-pollution machines: a single oyster cleans 50 gallons of water a day. Sadly, like coral, oysters and other shellfish are very much threatened by ocean acidification, which is caused by the ocean's inability to absorb the excess greenhouse gas emissions from coal, oil, and natural gas...
- IND134-11 9. Jamaica Bay and the offshore Atlantic are one system: destruction in one area will inevitably affect the other. Jamaica Bay's 100 acres of restored wetlands serve as both nursery and habitat to small marine organisms; at high tide larger marine organisms travel into the bay to feed and spawn. The bay is habitat to several species listed as endangered, threatened, rare, and of concern. Williams Transco actually acknowledges possible harm to a number of species, including the North Atlantic right whale, leatherback sea turtle, Kemp's Ridley sea turtle, green sea turtle, and loggerhead sea turtle. It admits that construction will likely harm the Atlantic sturgeon (now endangered; most other types of sturgeon are extinct or nearly so), as well as flounder, monkfish, bluefish, black sea bass, and the Atlantic, Spanish and king mackerel, and about 30 other species of fish. Bear in mind that this area is both a commercial and a recreational fishing area. And damage in this one area carries out to other parts of the vast marine world.
- IND134-12 10. The Jamaica Bay Wildlife Refuge and Floyd Bennett Field are part of the Atlantic flyway: a stopping point or nesting ground for over 300 species of bird, including a host of marine and shore birds, peregrine falcons, the endangered piping plover and roseate tern. They also provide habitat for 50 species of butterfly, including the threatened checkered white butterfly. A single spill of drilling fluid or a gas leak, like the National Grid spill in nearby Paerdegat Basin, could put all this at risk.
- IND134-13 Given all that is at stake in this area – and these comments barely touch the surface – it is beyond baffling, it is truly shocking that this pipeline project should have progressed as far as it has without someone in the government calling a halt.

- IND134-8 Comment noted. The Rockaway Project is not expected to significantly impact artificial reefs. In fact, the preferred route avoids artificial reef structures relative to other alternative routes as discussed in Section 3.4 of the EIS. Impacts on coral are discussed in Section 4.6.3.2 of the EIS.
- IND134-9 Comment noted. As discussed in Section 4.6.3.2 of the EIS, construction of the Rockaway Delivery Lateral would disturb less than 100,000 cubic yards of seabed sediment due to offshore excavations. See the response to comment CM1-85 regarding the potential for resuspension of contaminated sediments in the water column.
- IND134-10 Comment noted. Impacts on benthic species, which include oysters, are discussed in Sections 4.5 and 4.6 of the EIS.
- IND134-11 Comment noted. The Rockaway Project would not impact Jamaica Bay. Impacts on marine species are discussed in Sections 4.5 through 4.7 of the EIS. Impacts on fisheries are discussed in Sections 4.8.4.1 and 4.9.6 of the EIS.
- IND134-12 Comment noted. The Rockaway Project would not impact the Jamaica Bay Wildlife Refuge. Impacts on birds are discussed in Sections 4.5.2.3, 4.5.2.4, 4.5.3, 4.7.1.5, and 4.7.5 of the EIS. Impacts on wildlife are discussed in Sections 4.5 through 4.7 of the EIS.
- IND134-13 Your opposition to the Rockaway Project is noted.

IND135 – Alexa Coyle

20131209-5023(28967268).txt

Alexa Coyle, New York, NY.
Dear Commissioners,

IND135-1 As a New Yorker, a beach goer and an environmentalist, I urge you to keep the Rockaway Pipeline out of our city. This dangerous and dirty energy source has no place in our amazing city. The risk of harm to our land and residents through explosion and pollution is enough reason to keep this pipe from infiltrating our neighborhoods, but add to that the fact it will detract from the beauty of our beaches and parks and that we absolutely have no need for this additional energy source anyway, and it's clear that the only choice is to keep the pipeline out.

Please listen to me and to my neighbors, who feel strongly that the Rockaway Pipeline is not welcome in our lives.

Sincerely,
Alexa Coyle

Page 1

IND135-1

Your opposition to the Rockaway Project is noted. Pipeline safety is discussed in Section 4.12 of the EIS. As discussed in Section 4.8.8 of the EIS, visual impacts on the beach and at Floyd Bennett Field would be short term and temporary, limited to the period of construction. The purpose and need for the Projects are discussed in Section 1.1 of the EIS.

IND136 – Martha Cameron

20131209-5024(28967271).txt

Martha Cameron, Brooklyn, NY.
The Elephant in the Room

IND136-1 There are many many reasons to reject the Rockaway Lateral pipeline, most especially its initiating premise: the supposed "need" for more gas and more gas infrastructure.

The only entities that truly need this pipeline are the two principal corporations involved in building it, namely, National Grid and Williams Transco. And their need is not based on providing a service to New Yorkers; rather, it is their open-ended and insatiable need to make a profit. And they make that profit by selling the "need" for gas and gas infrastructure.

IND136-2 What New Yorkers truly need is a different approach to energy, one that involves public financial support for energy efficiency in transit, energy conservation in buildings, a modern energy distribution system, and a rapid conversion to renewable energy. But this can only be achieved if there is the political will – and the public financial support – to bring this about. It cannot be achieved if the government at all levels continues to promote natural gas and other fossil fuels with political propaganda about "energy independence," false claims about job creation, and above all, massive taxpayer subsidies.

IND136-3 This brings us to the elephant in the room: climate change.

The real problem with the Rockaway Lateral is not the pipeline itself but the gas that it will carry. Natural gas. Methane. A greenhouse gas that is vastly more potent than CO2: 1 ton of methane is equivalent to 72 tons of CO2 over a 20-year period. And 20 years is all we've got.

In order to prevent complete and irreversible climate catastrophe, we must reduce our emissions of greenhouse gases (GHGs; primarily carbon dioxide, methane, and nitrous oxide) at such a rapid rate over the next two decades that nothing short of a global Manhattan project will make this possible. Yet our government does nothing to make this happen. Worse, it actively promotes the sale and use of fossil fuels in every way it can.

On the international level, climate talks are a joke. The State Department schools other countries in the technology of fracking, while the War Department engages in saber-rattling exercises with other contenders for oil and gas deposits in the Arctic and the South China Sea. Controlling oil reserves has been the main impetus behind our wars and geopolitical gamesmanship in the Middle East since the end of World War II.

Domestically, we're on a tear to wring every last drop of oil and gas out of our shale deposits. Chemical contamination of ancient aquifers, surface water, and soil, rising rates of deadly truck accidents, silicosis, earthquakes, radon, air pollution, community destruction – be damned. Drill that oil! Tap that mountain! Pump that gas! Ship it ship it ship it – by rail, by truck, by boat – through small towns, across Great Lakes, down river, upstream, over hill and dale. Sell! Sell! Sell! There's money in them thar hills!

And none of this is possible without pipelines. Miles and miles and miles of pipelines. And compressor stations and metering stations and well heads and LNG ports – all approved by a government that is oiling the skids – literally – so that Big Energy can make a buck.

Fossil fuels are good for the economy – so goes the government mantra. Natural gas is "cheap" – if you don't count the true cost to the environment or the price hikes that will surely follow when we start to export on a major scale. Natural gas gives us "energy independence" for as long as it lasts. Natural gas is "clean" – disregard the radon and methane in that pretty blue flame. Natural gas is a

Page 1

IND136-1 The purpose and need for the Projects are discussed in Section 1.1 of the EIS.

IND136-2 Comment noted. Energy conservation and renewable energy alternatives are discussed in Sections 3.2.1 and 3.2.2 of the EIS.

IND136-3 Comment noted.

IND136 – Martha Cameron (cont'd)

IND136-3 20131209-5024(28967271).txt
(cont'd) "transition fuel" – to what? The end of the earth as we know it?

Our government and all the regulatory agencies involved have abdicated their responsibility to the people. In 2010, the white House released draft NEPA guidelines for assessing impacts of climate change and greenhouse gases, but in three years there has been no forward motion on implementing these guidelines. This is entirely within the president's purview, yet nothing has happened. If those guidelines were mandatory, FERC would have to consider not just the immediate impact of the pipeline but the impact on climate change of the natural gas that it is transporting. In which case, this project wouldn't stand a chance.

We haven't got much time. The weather we are experiencing now is the result of greenhouse gas emissions dating from the 1950s and 1960s, which means things are only going to get worse: our global emissions have gone up every decade and in the last 10 years they have soared. The coal that we mine but no longer burn here is still being burned – in China. The shale gas and oil that we export is still being burned – in Canada, in Europe, in Latin America. The tar sands that we import from Canada is still destroying the boreal forest – a global carbon sink twice the size of the earth's rain forests. Digging up fossil fuels – from the deep ocean, from the mountains, from the earth – is a recipe for short-term profit and a death sentence for the planet as we know it. Already we are in the midst of the sixth great extinction, losing species a thousand times faster than the normal background rate. If we don't stop this madness, one of those species will us. What an irony that we call ourselves Homo sapiens – "wise man." Perhaps we should rename ourselves: Homo insanus. Only an insane person destroys his home for a worthless piece of paper.

We can't eat coal. We can't drink oil. We can't breathe gas. What will we do when the well runs dry?

The ball is now in FERC's court. It is up to you to put a stop to this insanity.

IND137 – Elliot Figman

20131209-5025(28967274).txt

IND137-1 | Elliot Figman, New York, NY.
This facility should not be built. Period. We need to be moving as quickly as possible away from the burning of fossil fuels. This facility will encourage the continued use of gas, which is a fossil fuel. There are cleaner alternatives that will not exacerbate already dire prospects for climate chaos.

Page 1

IND137-1

Comment noted. Renewable energy alternatives are discussed in Section 3.2.2 of the EIS.

IND138 – Elliot Figman

20131209-5026(28967275).txt

IND138-1 Elliot Figman, New York, NY.
This facility will enable gas from the Marcellus shale to come into the city. This gas is more radioactive than the gas that currently comes into the city. At the very least, the regulations should specify the acceptable level of radon in the gas coming into our kitchens. It should also require that the source of the gas be made public. But these are only half measures--this project should be stopped in its tracks. It's a menace to public health, the environment and the climate.

Page 1

IND138-1

Your opposition to the Rockaway Project is noted. See the response to comment CM1-21.

IND139 – Peter Eliscu

20131209-5027(28967278).txt

IND139-1 Peter Eliscu, New York, NY.
The burden of proof for justifying the approval of a project should lie squarely on the Federal Energy Regulatory Commission. This is not an instance of "benign until proven harmful," but just the opposite. The Commission seems to have taken the erroneous position on project after project that it has no responsibility to insure that the public, the environment, and the planet itself are protected by its actions. This is the crux of the matter, and it is unconscionable. No project should be given a green light without demonstrating beyond a reasonable scientific doubt that it will not jeopardize the citizens who are in reality the foundation of government. Contrary to this underlying principle of democracy, the majority of the members of the Commission appear to have aligned themselves with the fossil fuel industry, which clearly poses a threat to the safety, health, and future of the planet. In my opinion, by voting in the past to approve dangerous fossil fuel infrastructure projects like the Rockaway Lateral Delivery Project now under consideration, these individuals have broken the trust that was given them not only by the residents of New York State, but by the citizens in all states. It is time to rectify this betrayal of trust and reject any further incursions of the gas industry infrastructure into New York State.

IND139-1

Comment noted.

Page 1

IND140 – Jessica Roff

20131209-5028(28967280).txt

IND140-1 Jessica Roff, Brooklyn, NY.
Williams first submitted its plan in March, 2009. FERC issued its draft Environmental Impact Statement on October 4, 2013. After the dEIS was complete, Williams submitted an additional approximately 1000 pages of information – including changing the timing on most of their work from winter to summer – making much of the dEIS potentially obsolete and demonstrating Williams' willingness to ignore government rules and deadlines.
The impacts to the ocean, marine life, and the people of the Rockaways is completely different in the winter than it is in the summer. The dEIS no longer accurately assessed these impacts. This is unacceptable and at the very minimum a new EIS must be completed.

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IND140-1

See the response to comment CM1-14.

IND141 – Jessica Roff

20131209-5029(28967282).txt

IND141-1 Jessica Roff, Brooklyn, NY.
This pipeline project has been segmented between city and Federal jurisdiction; Williams Transco is supposed to build the ocean pipeline and the metering and regulating station under Federal jurisdiction, while the connecting pipeline is a National Grid project under city jurisdiction. This fact make safe and effective oversight and regulation problematic. Further, it raises many questions about emergency response when - and it is a question of when, not if - there is some kind of accident, leak, explosion, or other unforeseen problem with the pipeline. Local police, fire, and ambulance workers haven't been told about the added dangers of this pipeline. They are not receiving special training. They do not have, and city and federal budgets will not allow for, extra training and equipment. Placing this pipeline across multiple jurisdictions that have rarely had emergency response needs in the past is essentially an unfunded mandate to all the local first responders and this is a major problem. And, to add insult to injury for the people of the Rockaways - an area devastated by Sandy and since then only partially rebuilt and having no protections repaired or built since the storm - this pipeline also runs down one of only two evacuation routes for a long peninsula of over 100,000 people. This is a travesty.

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- IND141-1 Comment noted. Safety for pipelines that transport natural gas are subject to the DOT's Minimum Federal Safety Standards in 49 CFR Part 192. Also see the response to comment CM1-56.
- IND141-2 Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS.
- IND141-3 Comment noted.

IND142 – Margaret Vreeland

20131209-5030(28967284).txt

Margaret Vreeland, Chicago, IL.
Do not provide the certificate, for the following reasons:

- IND142-1 1. Pipeline Safety
"Since 1986, pipeline accidents have killed more than 500 people, injured over 4,000, and cost nearly seven billion dollars in property damages." [1] in the United States alone. The Rockaway Lateral Pipeline will be vulnerable to leakage during construction, from natural disasters, from terrorism, and from corrosion. Current national inspections of pipelines are inadequate, with only 7% of natural gas lines inspected each year. The Pipeline and Hazardous Materials Safety Administration (PHMSA) is chronically short of inspectors. It has funding for only 137, but had only 110 inspectors on staff in 2010. Transco plans its own in-person inspections only once every 7 years. And pipelines DO explode: About 300 per year, on average, causing property damage, injuries – and death.
1. Lena Groeger, Pipelines Explained: How Safe are America's 2.5 Million Miles of Pipelines? Pro Publica November 15, 2012.
- IND142-2 2. Fire and Flood Hazards
"The transportation of natural gas by pipeline involves some incremental risk to the public due to the potential for an accidental release of natural gas. The greatest hazard is a fire or major pipeline rupture." (Draft EIS 4.12)
In Floyd Bennett Field, the Metering & Regulating Facility's regulator vault will be placed one foot above the floor of an airplane hangar which is at a 16' elevation above sea level. This is in a flood zone where water crested at 14' after Hurricane Sandy. The potential mix of seawater and gas is a dangerous one.
When regulator vaults flood, the regulator mechanism's ability to reduce gas pressure can be significantly impaired. Water can cause the regulator to be stuck in the open position, dramatically increasing the pressure. If gas comes into a home or business at a higher pressure than it's supposed to, a fire or explosion can result. Williams Transco claims that the likelihood of flooding is not significantly greater now than in the summer of 2012, just before Hurricane Sandy, despite authoritative findings of the Intergovernmental Panel on Climate Change (IPCC) that sea level rise is inevitable and man-made.
- IND142-3 3. Impacts on Protected Species
The project will have negative impacts on endangered and protected species. The DEIS acknowledges that this project "is likely to adversely affect Atlantic Right whale and Atlantic Sturgeon," and that it may also have impacts for the Leatherback Sea Turtle, Kemp's Ridley Sea Turtle, Green Sea Turtle, Loggerhead Sea Turtle, Roseate Tern, Piping Plover, and Seabeach Amaranth. These impacts result from a variety of factors including pile driving noise, dredging, ocean debris, and the potential for collision with vessels.
- IND142-4 4. Impacts on Marine Wildlife
Noise in the immediate area of pile driving for pipeline construction would exceed the injury threshold for fish, and the behavioral disturbance threshold for sea turtles; and would exceed the behavioral disturbance for marine mammals for a distance of 2.86 miles. In fact, Williams Transco has applied to the National Ocean and Atmospheric Administration (NOAA) for authorization for "Intermittent Level B Harassment" of six marine mammal species. Construction of the offshore pipeline also would directly disturb approximately 38 acres of seabed due to dredging and jetting. Benthic species in these areas, such as Surfclams, most likely would perish.
- IND142-5 5. Impacts on Essential Fish Habitat
The pipeline will be located in a marine area that supports Essential Fish Habitat for 21 species. In addition to noise impacts discussed above, offshore excavations would create turbidity plumes in the water column that could clog fish gills, obscure visual stimuli, and reduce food intake for some fish. It is estimated that up to 402 acres of seabed could be affected by sedimentation.
- IND142-6 6. Dredging of Toxins

Page 1

IND142-1 Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS.

IND142-2 Comment noted. See the responses to comments CM1-8 and CM1-50. Pipeline safety is discussed in Section 4.12 of the EIS.

IND142-3 Comment noted. Impacts on threatened and endangered species are discussed in Section 4.7 of the EIS.

IND142-4 Comment noted. Impacts on marine species are discussed in Sections 4.5 through 4.7 of the EIS.

IND142-5 Comment noted. Impacts on EFH are discussed in Sections 4.6.3 through 4.6.6 of the EIS.

IND142-6 Comment noted. See the response to comment CM1-85.

IND142 – Margaret Vreeland (cont'd)

IND142-6 (cont'd)	<p style="text-align: center;">20131209-5030(28967284).txt</p> <p>The waters off Gateway National Recreation Area are the site of some of the worst dumping along the East Coast. According to an ad hoc committee's 1970 report, it is part of the largest grossly polluted area in the United States, and contains lead, chromium, copper, gold, selenium, and zinc. These toxins have been buried and kept out of the waters for years, but could be brought up by dredging related to this project, poisoning local fish and ruining commercial fisheries.</p>
IND142-7	<p>7. Mitigation Procedures Inadequate While "mitigation procedures" such as monitoring protected species are described by Williams Transco, and additional reviews of potential impacts have been recommended by FERC, we have no assurance that these measures will be sufficient to avoid unacceptable environmental harms. Certainly they will not protect us from the "upstream" impacts of fracking and climate change.</p>
IND142-8	<p>8. The Project Will Encourage Fracking The substantial cost of construction of this pipeline puts economic pressure on Williams Transco to continue pumping gas through it as long as possible, and the only new sources of gas available are from fracking shale formations. The more pipelines, the more financial incentive to continue the practice of fracking.</p>
IND142-9	<p>9. It Will Exacerbate Climate Change Although "natural gas" burns cleaner than coal or oil, the extraction and transportation of this gas is much more damaging to the atmosphere. Natural gas is methane, which contributes much more to global warming than an equivalent amount of CO2. Any leak in a pipe, or release of gas to mitigate pressure (both of which happen frequently) is very harmful, and the extraction process releases large amounts of methane.</p>
IND142-10	<p>10. Investing Billions In Fossil Fuels Infrastructure Is A Disincentive To Investment In Renewables Wind, water and solar power can be scaled up in cost-effective ways to meet our energy demands, freeing us from dependence on both fossil fuels and nuclear power.</p>

IND142-7	Comment noted. See the response to comment CM2-19.
IND142-8	See the response to comment CM1-6.
IND142-9	Comment noted. Our analysis of air quality impacts in Section 4.11.1 of the EIS includes fugitive emissions resulting from operation of the Projects.
IND142-10	Comment noted. Renewable energy alternatives are discussed in Section 3.2.2 of the EIS.

IND143 – Elise Knudson

20131209-5031(28967286).txt

IND143-1 Elise Knudson, Beacon, NY.
The pipeline would encourage more hydrofracking in the Hudson Valley. Clean water is an important natural resource in New York State and City that is currently free. It is not clear what effect fracking will have on our water over time. No one can know this. I am deeply concerned about the effect on the environment but also on the water supply for all the millions of people that depend on it. who will be able to afford bottled water for every cooking, cleaning and consumption need for the rest of their lives? who will pay for the clean up?

IND143-2 The exhaust from the trucks that carry the sand, the areas affected by the diverting of water to be used in processing and the chemical waste are all troubling concerns. And this is before considering what will happen when the pipe breaks as all pipes do eventually.

I oppose the pipeline now and forever.

Elise Knudson

IND143-1 Comment noted. See the response to comment CM1-6.

IND143-2 Your opposition to the Rockaway Project is noted. See the response to comment CM1-6. Pipeline safety is discussed in Section 4.12 of the EIS.

IND144 – Jen Fisher

20131209-5033(28967290).txt

IND144-1 | jen fisher, forest hills, NY.
| NO! ABSOLUTELY NOT!!!!
| NO MORE DESTRUCTIVE FUELS. It is time to move on.

IND144-1

Comment noted.

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IND145 – Edith Kantrowitz

20131209-5034(28967292).txt

IND145-1 | Edith Kantrowitz, Brooklyn, NY.
FERC should not approve the Rockaway Pipeline with so many questions about radon exposure till unanswered. We know that the gas this pipeline will carry will include shale gas from the Marcellus, a very different, and much more radioactive, supply than what we have historically been receiving from the Gulf Coast. Why would FERC, or anyone for that matter, think that radon levels in this pipeline will be acceptable, when we know that the gas is coming from a source containing much more radon than ever before? Williams Transco and National Grid should be required to detail the percentage of the gas mix they intend to deliver. They should be required to specify its source, and its level of radioactivity. The draft EIS needs to include much more information about what modifications would be implemented if radon levels exceed accepted levels, how quickly this would be done, and what agency would be responsible. It should also state how and when residents will be notified by Williams Transco or National Grid, in the event that their gas supply exceeds regulated limits for radioactivity. FERC should not approve this pipeline unless Williams Transco and National Grid can prove that the gas delivered will not contain dangerous levels of radon. If this project is really to be in the public interest, we must follow the precautionary principle, and not wait until a problem happens before we address it.

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IND145-1

See Section 4.11.1.5 of the EIS and the responses to comments CM1-21 and CO11-23.

IND146 – Beverly Birks

20131209-5035(28967293).txt

IND146-1 | Beverley Birks, New York, NY.
CP13-36-000. Climate change is the international global crisis of our time. Because acting to limit climate change affects economic profit of the fossil fuel companies and requires long term planning, it is being ignored. Yet, Hurricane Sandy destroyed the Rockaways last year and makes it imperative that we (the American people and the American government) do all we can to slow it down and stop it. Every investment in fossil fuel infrastructure is an investment in death and destruction. This is a pipeline which is being built to sell natural gas to foreigners because corporations will make more money. This will encourage fracking. Fracking releases methane which is 100 times more potent as a greenhouse gas than CO2 in a 21 year life cycle and 32 times more potent in a 100 year cycle. Methane is vented at the well head and again when it is converted into LNG and regularly during the time than it is in its LNG state. This infrastructure will encourage more fracking and more methane release and more damage to the planet. We need to build a wind farm off of the Rockaways which can be sustainable and not produce greenhouse gas. We don't want fracked gas infrastructure and we don't want to invest in death and destruction. Only a government which has been bought by the fossil fuel corporations and their companions the fossil fuel infrastructure corporations would contemplate building the Rockaway pipeline.

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IND146-1

Comment noted. The Projects do not involve the export of natural gas; the Projects would supply gas to New York City. Renewable energy alternatives are discussed in Section 3.2.2 of the EIS. See the response to comment CM1-6.

IND147 – Edith Kantrowitz

20131209-5036(28967294).txt

Edith Kantrowitz, Brooklyn, NY.

Here is a bit more of a breakdown on the ways in which this project's impacts on the ecosystem are unacceptable:

- IND147-1: **Impacts on Protected Species**
The project will have negative impacts on endangered and protected species. The October 2013 dEIS acknowledges that this project "is likely to adversely affect right whale and Atlantic sturgeon," and that it may also have impacts for the leatherback sea turtle, Kemp's ridley sea turtle, green sea turtle, loggerhead sea turtle, roseate tern, piping plover, and Seabeach amaranth. These impacts result from a variety of factors, such as pile driving noise, dredging, ocean debris, and the potential for collision with vessels.
- IND147-2: **Impacts on Marine Wildlife**
Noise in the immediate area of pile driving for pipeline construction would exceed the injury threshold for fish, and the behavioral disturbance threshold for sea turtles; and would exceed the behavioral disturbance threshold for marine mammals for a distance of 2.86 miles. In fact, Williams Transco has applied to the National Ocean and Atmospheric Administration (NOAA) for authorization for "Intermittent Level B Harassment" of seven marine mammal species.
- IND147-3: **Impacts on Essential Fish Habitat**
The pipeline will be located in a marine area that supports Essential Fish Habitat for 21 species. In addition to noise impacts discussed above, offshore excavations would create turbidity plumes in the water column that could clog fish gills, obscure visual stimuli, and reduce food intake for some fish. It is estimated that up to 402 acres of seabed could be affected by sedimentation.
- IND147-4: **Impacts on Marine Wildlife**
Construction of the offshore pipeline would directly disturb approximately 38.0 acres of seabed due to dredging and jetting. Benthic species in these areas, such as surfclams, most likely would perish.
- IND147-5: **Mitigation Procedures Inadequate**
While "mitigation procedures" such as monitoring protected species are described by Williams Transco, and additional reviews of potential impacts have been recommended by FERC, we have no assurance that these measures will be sufficient to avoid unacceptable environmental harms. And they certainly will not protect us from the 'upstream' impacts of fracking and climate change.

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- IND147-1 Comment noted. Impacts on threatened and endangered species are discussed in Section 4.7 of the EIS.
- IND147-2 Comment noted. Impacts on marine species are discussed in Sections 4.5 through 4.7 of the EIS. Transco's request for an IHA under the MMPA is discussed in Section 4.5.2.2 of the EIS.
- IND147-3 Comment noted. Impacts on EFH are discussed in Sections 4.6.3 through 4.6.6 of the EIS.
- IND147-4 Comment noted. Impacts on benthic species are discussed in Sections 4.5 and 4.6 of the EIS.
- IND147-5 Comment noted. See the response to comment CM2-19.

IND148 – Jessica Roff

20131209-5037(28967296).txt

IND148-1 Jessica Roff, Brooklyn, NY.
The fact that FERC approves more than 99% of all pipelines and that FERC states in the draft EIS that this project "would result in limited adverse environmental impacts, which would mostly occur during construction, " are clear indications that FERC is not actually determining what is necessary and of "public convenience." There is massive opposition to this unnecessary pipeline.

I am writing these comments to the draft Environmental Impact Statement under protest because I do not believe that this is a fair and open comment period and that these comments will be duly considered. If they were to be, then the Spectra Pipeline, with over 5000 comments in opposition to its construction, would have been stopped. Please prove me wrong.

IND148-2 The Rockaways of 2009 was a very different place than the Rockaways of 2013. Williams has not made any changes to its proposal to address the realities of building infrastructure in post-Sandy Rockaways. In fact, in the dEIS, Williams stated that "the ability to forecast hurricanes several days in advance would allow it to ensure the safety and integrity of its system . . ." However, Williams has a history of violations ranging from failures to follow internal policies and to inspect infrastructure, to explosions. And, inspections are proposed to occur only once every 7 years; nationwide, 7% of pipelines are inspected regularly. These facts are particularly troublesome given Williams Transco's poor safety record.

IND148-3

IND148-4 One of the standards for approval of a proposal is the builder's technical competence. It is clear from Williams Transco's track record that they are lacking in competence.

A few examples:
As of June 2012, Williams was under a federal corrective order for 44 of the preceding 45 months. In 2013 there were 5 incidents, including two major explosions in Louisiana and New Jersey. From 2011 to 2013 Williams Transco projects have had incidents including, but not limited to, explosions, leaks, ruptures, fires. There were 13 injuries in a Branchburg, NJ explosion and 2 killed and 60 injured in a Geismar, LA explosion and fire.

This non-exhaustive list of violations and tragedies alone should be enough to show that Williams Transco is not competent to build this pipeline, but of course there are many other problems. Ignoring these facts is further indication that this process is not democratic.

IND148-5 At a bare minimum the EIS must be redone and the people of the Rockaways must be duly informed and educated about the entire pipeline building project.

Page 1

IND148-1 Comment noted. See the responses to comments CM1-1 and CM1-168.

IND148-2 Comment noted.

IND148-3 Comment noted. Pipeline safety, including Transco's incident history, is discussed in Section 4.12 of the EIS.

IND148-4 See the response to comment CO3-1.

IND148-5 See the response to comment CM1-1.

IND149 – Edith Kantrowitz

20131209-5038(28967298).txt

IND149-1 | Edith Kantrowitz, Brooklyn, NY.
The draft EIS' assessment of the environmental impact of the 7-mile pipeline project situated in Gateway National Recreation Area is invalid because the project has been artificially segmented between two entities, National Grid and Williams Transco. National Grid's portion of the pipeline, the Brooklyn-Queens Interconnect (BQI), has been treated as an "intrastate" retail supply line and has been exempted from the FERC review process, even though the gas passing through its portion of the pipeline cannot be used by retail customers until it passes through the metering and regulating station which Williams Transco would build in Floyd Bennett Field. This segmentation has allowed the National Grid portion of the project to bypass the close scrutiny of NEPA, needing only a NYC government review resulting in a "FONSI" determination, even though it passes directly under the environmentally sensitive Jamaica Bay inlet.

IND149-2 | This is a travesty, because the ecosystems of Jamaica Bay and Floyd Bennett Field should have been taken into account, and should have been carefully and extensively reviewed by both FERC, and the NY State Department of State for Coastal Zone Management consistency. The area through which the Brooklyn Queens Interconnect passes contains both a "Special Natural Waterfront Area," and "Significant coastal Fish and Wildlife Habitat." In 2012 the EPA advised FERC in its review: "A comprehensive evaluation of cumulative, indirect and secondary impacts should be presented. The cumulative impacts analysis should consider the environmental impacts of the National Grid pipeline, without which the Rockaway Delivery Lateral would not be constructed." Federal case law says a project cannot be segmented so as to avoid review. It appears that FERC has ignored both the EPA advice and the law. FERC should include a comprehensive evaluation of the cumulative impacts of the entire project—including the National Grid pipeline—in its environmental review.

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IND149-1 See the response to comment CM1-56.

IND149-2 See the responses to comments CM1-56 and CM1-122.

IND150 – Alice Zinnes

20131209-5039(28967299).txt

IND150-1 Alice Zinnes, Brooklyn, NY.
FERC must not approve the Rockaway Lateral Delivery Project to be constructed by Williams Transco and National Grid.

FERC has not undertaken an environmental study of the amount of methane that might leak from this pipeline. Since methane is a greenhouse gas at least 20 times dirtier than coal over a 100-year time-frame (and 100-times dirtier over 20 years), taking into account the amount of methane that might leak from this pipeline is mandatory. The Rockaway Lateral will run exactly where Hurricane Sandy, a storm whose power was aggravated by climate change, destroyed communities and shoreline. Construction of this greenhouse-gas emitter pipeline in the Rockaways therefore is even more criminal.

All natural gas pipelines leak methane, and the applicants to this project have not proven that this pipeline will be any better. For a recent study of methane already leaking from gas pipes under Manhattan, please go to <http://bit.ly/18v16Jl>. This study shows that the resulting methane emissions estimate for Manhattan alone was 8.6 billion cubic feet per year, or about 2.86% of the 300 billion cubic feet of gas handled by the entire ConEd system each year. See more at: <http://bit.ly/1glEUR5>. Rather than build more pipelines, America must reduce the number of gas pipelines already in existence.

IND150-2 This new pipeline also will put pressure to frack for more natural gas, and fracking also increases emissions of the greenhouse gas methane. See Prof. Robert Howarth's peer-review study at <http://link.springer.com/article/10.1007%2Fs10584-011-0061-5>. Also, the EPA has recently announced, 50% more of the powerful green house gas, methane, escapes from frack sites than was previously thought.

Although FERC seems not to care about climate change, FERC must consider the effect of methane leakage before permitting this pipeline to be built.

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IND150-1

See the responses to comments CM2-13 and IND10-19.

IND150-2

See the response to comment CM1-6.

IND151 – Eileen Rourke

20131209-5040(28967300).txt

Eileen Rourke, New York, NY.
100 Beekman Street

New York, NY 10038

December 8, 2013

Ms. Kimberly D. Bose, Secretary
FERC
888 First Street, NE
Washington, DC 20426
Dear Ms. Bose:

FERC Comment/ Submission Dec 8 2013 -Re: CP-13-36-000

IND151-1 I am writing as an individual New Yorker to express my opposition to the Rockaway Delivery Lateral Project (herein referred to as the RDLP). Regulatory agencies, like FERC, play a critical role in our country's governance and policies, although they do not get as much attention as they should. As a citizen, I am calling upon FERC to represent the interests of government and citizens, rather than corporate interests, and take responsible action, within FERC's scope of responsibility, to prevent further development of the RDLP. RDLP SHOULD NOT BE APPROVED and NOT BE BUILT. There are numerous practical reasons why this pipeline project should not go forth. I know FERC is receiving many comments from concerned citizens and environmental groups/ "interveners". So, I will just outline a few areas that are of most concern to me. Please do NOT allow FERC to issue the Certificate of Public Convenience & Necessity. Respectfully submitted,
Eileen Rourke

COMMENTS on FERC CP-3-36-000/RDLP
1) SAFETY/Disaster Mitigation - Safety of people, property, economy and natural environment

IND151-2 Building this pipeline threatens the lives, health and quality of life for the people who live close by as well as the NYC Metropolitan Region. FERC must enforce their regulatory authority of natural gas projects, to mitigate another potential physical disaster. If not, and a pipeline leak or explosion resulted, RDLP offers the potential for economic downturn that would result from the destruction of homes, businesses, some of which could not be rebuilt due to the permanent damage to the environment that this pipeline could cause. Individual people and government, not greedy corporations will end up again paying the bill for the damages.

IND151-3 Learn from the past: Storm Sandy is not in the too distant past, but already people and government are trying to forget it and not learn the lesson. So, it is ironic that one of the very areas (the Rockaways) that was most negatively affected is already on the block for further destruction!

IND151-4 2) Environmental Protection for the Benefit of All
We should be protecting our natural wildlife and lands, though I am well aware that this is not a priority to many corporations and some government officials, who get paid off by lobbyists. Although FERC is not concerned specifically with the natural environment, the energy projects your agency is responsible for overseeing, has immense impact on our environment, both physically and economically. The Rockaway/Jamaica Bay area, threatened by Transco/RDLP, includes some of the regions beautiful beaches, rare wildlife habitats, which not only enhance quality of life of people, but contribute to economic development. Even big businesses will ultimately get destroyed if they continue to go about their business irresponsibly - eventually everything will cease to function.

3)
Government Responsibility: FERC has the authority to question the safety and soundness of this project and also has the responsibility to consider advice of other govt. entities, and follow the law.

Page 1

IND151-1 Your opposition to the Rockaway Project is noted.

IND151-2 Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS.

IND151-3 Comment noted.

IND151-4 Comment noted.

IND151 – Eileen Rourke (cont'd)

20131209-5040(28967300).txt
In 2012, EPA advised FERC that a comprehensive environmental evaluation should be presented. The government should conduct an objective EIS before any such project is allowed to proceed. Segmenting the project into 2 parts of the project to avoid review is not acceptable. B-QI has been falsely categorized as a local distribution pipe (I am questioning the motive for this as, according to the FERC website, FERC "does not regulate local distribution pipelines of natural gas".) As a result, the National Grid was allowed to be constructed in the Rockaway Inlet right through the Jamaica Bay Wildlife Refuge.

IND151-5

IND151-6

FERC needs to consider pipeline safety issues, which don't always have a reliable track record. The companies involved with energy projects need severe investigation before any of their projects get approved by the government. Because government agencies often don't have sufficient resources for monitoring/inspections, companies get away with things. Nevertheless the government gets stuck footing the bill of energy industry clean-ups. Instead of spending the funds upfront to mitigate these environmental catastrophes. The numbers of pipeline accidents point to the issues. I am referencing compelling statistics from an investigative report done by Pro Publica, November 15, 2012, Lena Groeger, Pipelines Explained: How Safe are America's 2.5 Million Miles of Pipelines?

"since 1986, pipeline accidents have killed more than 500 people, injured over 4,000, and cost nearly seven billion dollars in property damages" [1] in the United States alone. The Rockaway Lateral Pipeline will be vulnerable to leakage during construction, from natural disasters, from terrorism, and from corrosion. Current national inspections of pipelines are inadequate, with only 7% of natural gas lines inspected each year. The Pipeline and Hazardous Materials Safety Administration (PHMSA) is chronically short of inspectors. It has funding for only 137, but had only 110 inspectors on staff in 2010. Transco plans its own in-person inspections only once every 7 years. And pipelines DO explode: About 300 per year, on average, causing property damage, injuries – and death.

IND151-5

See the responses to comments CM1-56 and CM1-122.

IND151-6

Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS.

IND152 – Jessica Roff

20131209-5041(28967301).txt

Jessica Roff, Brooklyn, NY.

IND152-1 The fact that FERC approves more than 99% of all pipelines and that FERC states in the draft EIS that this project "would result in limited adverse environmental impacts, which would mostly occur during construction, " are clear indications that FERC is not actually determining what is necessary and of "public convenience." There is massive opposition to this unnecessary pipeline. I am writing these comments to the draft Environmental Impact Statement under protest because I do not believe that this is a fair and open comment period and that these comments will be duly considered. If they were to be, then the Spectra Pipeline, with over 5000 comments in opposition to its construction, would have be stopped. Please prove me wrong.

IND152-2 The metering and regulating station is located in an historic, landmarked hangar. Floyd Bennett Field is nearly surrounded by bodies of water at varying distances. Each of those bodies flooded during Hurricane Sandy and The floor of the metering and regulating station to be built in Floyd Bennett Field is proposed at 13.9 feet above the ground - with the equipment raised an additional foot. The Sandy storm surge was 14 feet, and though the hangars did not flood due to their elevation, with rising sea levels, ever increasing intensity of storms, and the proximity of numerous bodies of water, it is just a matter of time before the hangars do flood.

IND152-3 Plus, everything about this project will exacerbate climate change. Both the increase in fossil fuel use and release of methane at the metering and regulating station will add to climate change which in turn will increase the rise in sea level and temperatures, both of which made Sandy a far more destructive storm than was anticipated.

IND152-4 worse, the dEIS has absolutely no consideration of either climate change or the rising of sea levels and temperatures it will bring. Therefore the dEIS is inaccurate and incomplete in addressing impacts of flooding and ability to withstand storm damage. This is another reason to completely redo the dEIS and halt this project.

Page 1

IND152-1 Comment noted. See the responses to comments CM1-1 and CM1-168.

IND152-2 Comment noted. See the response to comment CM1-8.

IND152-3 Comment noted.

IND152-4 See the response to comment CM1-122.

IND153 – Alice Zinnes

20131209-5042(28967302).txt

- Alice Zinnes, Brooklyn, NY.
- IND153-1 FERC must not approve the Rockaway Lateral Delivery Project to be constructed by Williams Transco and National Grid because of the dangers it poses to the fish, birds and wildlife living near the proposed path of this pipeline.
- IND153-2 In connection with the project's construction Williams Transco has applied to the National Marine Fisheries Service for "Incidental Harassment Authorization" for seven marine mammals? These include gray seals, harbor seals, harp seals, the North Atlantic right whale, bottlenose dolphins, harbor porpoises, and short-beaked common dolphins.
- A number of endangered and protected species may be affected, as well. Williams Transco has acknowledged that the project "is likely to adversely affect" the Atlantic sturgeon, and "may affect" the North Atlantic right whale, leatherback sea turtle, Kemp's ridley sea turtle, green sea turtle, and loggerhead sea turtle. One of the most serious possible impacts is exposure to underwater noise resulting from pile driving in the construction process. But the dEIS also mentions a host of other concerns, including possible injuries from collisions with construction vessels or equipment, possible loss of feeding habitat as fish populations and organisms that dwell on the ocean bottom are disturbed, exposure to floating debris, exposure to toxic sediments, etc. (The dEIS states that 38 acres of seabed will be directly impacted by construction, and another 402 acres will be affected by sediment stirred up in the construction process. Some of this sediment is likely to include unidentified or proprietary substances that are toxic to marine life.)
- IND153-3 The Atlantic sturgeon is far from the only fish that may be affected. In fact, within the project construction area, Essential Fish Habitat has been identified for 39 fish species, including flounder, monkfish, bluefish, black sea bass, and the Atlantic, Spanish and king mackerel. Williams Transco states that, "Overall, impacts on managed species identified as having EFH in the Project area will vary depending on the species." In addition to the noise effects mentioned above, these impacts may include increased water turbidity from construction operations, direct loss of eggs and larvae during construction trenching operations, and reduction in available forage due to reduction of benthic (bottom dwelling) community densities.
- IND153-4 While Williams Transco states that benthic communities will re-establish over a short period of time, the timeline for this to happen is not at all certain. It will likely take several years for pre-construction levels to be established, and since maintenance will disrupt the trenched area again every seven years, the cumulative impacts may result in permanent ecosystem damage. Transco Williams has also acknowledged that their new plans to perform construction during the spring and summer, rather than during the winter as originally intended, may have a greater impact on benthic organisms.
- IND153-5 Birds also will be adversely effected. Even protected birds like the tern, and the piping plover live in the project construction area, as well as Jamaica Bay and Floyd Bennett Field. Williams Transco claims birds will not suffer any impacts directly related to construction, but this claim is completely unfounded. Before FERC approves this pipeline, Transco must prove that birds will not be hurt by the construction phase or all of the following years of operation. Nowhere where gas pipelines currently run have birds not been hurt. Just the huge amounts of methane leaks will hurt the birds.
- IND153-6 Williams Transco has proposed a variety of "mitigation" measures aimed at reducing or limiting the environmental impacts of the pipeline's construction, such as keeping a watch out for whales and sea turtles and holding off on construction operations when they are sighted. But do we really know how effective these measures will be? In many instances, Williams Transco asserts that possible negative impacts will be "minimal," they will be temporary, or they will only affect "individuals," not "populations." But Williams Transco has not proven these assertions. FERC must not permit this pipeline before it's proven safe to birds, fish, and wildlife,

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- IND153-1 Your opposition to the Rockaway Project is noted.
- IND153-2 Comment noted. Impacts on marine mammals are discussed in Section 4.5.2.2 of the EIS. Impacts on threatened and endangered species are discussed in Section 4.7 of the EIS.
- IND153-3 Comment noted. Impacts on EFH are discussed in Sections 4.6.3 through 4.6.6 of the EIS.
- IND153-4 Comment noted. Impacts on benthic species are discussed in Sections 4.5 and 4.6 of the EIS. See the response to comment CM1-14.
- IND153-5 Comment noted. Impacts on birds are discussed in Sections 4.5.2.3, 4.5.2.4, 4.5.3, 4.7.1.5, and 4.7.5 of the EIS.
- IND153-6 Comment noted. See the response to comment CM2-19.

IND153 – Alice Zinnes (cont'd)

IND153-9 | 20131209-5042(28967302).txt
(cont'd) | including all the endangered and protected species living near its path.

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IND154 – Edith Kantrowitz

20131209-5043(28967303).txt

Edith Kantrowitz, Brooklyn, NY.

Gas pipelines are highly subject to accidents and explosions. On the average, there are approximately 300 such explosions each year, causing property damage, injuries, and even deaths. One report states that, "Since 1986, pipeline accidents have killed more than 500 people, injured over 4,000, and cost nearly seven billion dollars in property damages" in the United States alone.

The Pipeline and Hazardous Materials Safety Administration (PHMSA), the federal agency charged with inspecting gas pipelines, "is chronically short of inspectors and lacks the resources needed to hire more, leaving much of the regulatory control in the hands of pipeline operators themselves, according to federal reports, an examination of agency data and interviews with safety experts." (http://www.nytimes.com/2011/09/10/business/energy-environment/agency-struggles-to-safeguard-pipeline-system.html?_r=3&pagewanted=all by Dan Frosch And Janet Roberts, NYT 9/9/11)

The state of pipeline inspections in this country is abysmal, with only 7% of gas lines being inspected each year. Williams Transco has indicated that they intend to perform their own in-person inspections only once every seven years, the minimum required by federal law.

IND154-1 The dEIS states, "Under Section 7(c) of the NGA, the Commission determines whether interstate natural gas transportation facilities are in the public convenience and necessity and, if so, grants a Certificate to construct and operate them. The Commission bases its decisions on technical competence, financing, rates, market demand, gas supply, environmental impact, long-term feasibility, and other issues concerning a proposed project."

But how "technically competent" is Williams Transco? Their record gives us little reason to be confident that they can guarantee our safety. Indeed, they have had 35 reportable accidents since 2006, and as of June 2012, had been under a federal corrective order for 44 of the prior 45 months.

Some of these accidents include:

September 2008, Appomattox, VA – pipeline fails, blowing a fireball that scorched an area 1,125 feet in diameter, leveling two homes and injuring 5 people and damaging 100 homes.

December 3, 2011, Marengo County, Alabama – "...one of the five parallel natural gas pipelines in Transco ruptured in Marengo County, Alabama. The force of the rupture created a large crater and propelled a 47-foot, 3-inch piece of buried pipe more than 200 feet away. The releasing gas also ignited and continued to burn for several hours, causing damage to one of the adjoining pipelines and scorching approximately eight acres of surrounding property." After an investigation of the incident, PHMSA noted that Williams, "has not determined whether the conditions that caused the failure exist on other portions of Transco," and determined that if Transco continued to operate the pipeline it would likely result in "serious harm to life, property, and the environment." (Owner of PA Natural Gas Facility that Exploded Has Lengthy Record of Pipeline Safety Violations: Natural Gas Watch <http://www.naturalgaswatch.org/?p=1305> Mar 30th, 2012 | By fjjgallagher)

Dec. 3, 2011, Sweet Water, AL: A coating failure, combined with extremely corrosive soil conditions, was blamed for pipeline rust that led to a massive explosion-heard more than 30 miles away-and a 90-minute blaze that burned eight acres of pine forest. Reports said flames were nearly 100 feet high. Transco released a statement saying they will "do our best to learn from this incident."

March 29, 2012, Lathrop Compressor, Springville, PA: A compressor station fire was initially reported as an explosion, but "DEP said Williams could not confirm all the details. However, bulging walls in the building indicated there may have been an

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IND154-1

See the response to comment CO3-1.

IND154 – Edith Kantrowitz (cont'd)

IND154-I
(cont'd)

20131209-5043(28967303).txt

explosion." Williams was not fined by DEP because the incident did not violate the station's air quality permits or federal pollution laws. About 1 ton of methane was released in that blast, clocking in below the greenhouse gas threshold that would have required them to seek a permit used by bigger facilities.

April 9, 2012, Bergen, NJ: A "pinhole" size leak was discovered by inspectors in a 36-inch-diameter section of pipeline.

July 23, 2012, Windsor Compressor, Windsor, NY: A lightning strike hit the ventilation stack at the Binghamton-area compressor station, causing an emergency shut down which, because it "purged a lot of remaining gas, caused a big fireball."

March 23, 2013, Cameron, WV: A 24-inch pipeline ruptured, causing no injuries. A Williams spokesperson would not say how much methane was released into the atmosphere as a result of the leak.

May 14, 2013, Mosquito Bay, LA: A small methane leak was discovered during a normal pipeline patrol in an unpopulated, swamp area.

May 15, 2013, Williams Central Station, Montrose, PA: The compressor station in the 100 block of Turnpike Road in Brooklyn Township caught fire. DEP officials said they found visual evidence of an explosion. Williams officials said that there was no explosion, only fire.

May 30, 2013, Branchburg NJ, 13 injured: workers were welding a portion of a nonactive pipe at the compressor station at the time of the explosion, Williams, which owns the Transco national gas pipeline, is building a controversial 6.6-mile pipeline extension in the Hunterdon County municipalities of Franklin, Clinton and Union.

June 13, 2013, Geismar, LA, 2 killed, 60 injured: A facility that processes natural gas liquids used for plastics manufacture exploded violently as employees fled an inferno that sent flames as high as 200 feet into the air.

July 2013, Ellicott City, MD, - Natural gas pipeline explodes, witnesses describe sound like a jet plane landing on the roof. Fortunately nobody was injured.

In short, Williams Transco has repeatedly demonstrated that they are sorely lacking in the technical competence to operate a project of this nature. To insure the public safety FERC should not approve this project.

IND155 – Alice Zinnes

20131209-5044(28967305).txt

Alice Zinnes, Brooklyn, NY.

IND155-1 FERC must not approve the Rockaway Lateral Delivery Project to be constructed by Williams Transco and National Grid because the problems that will be caused by the radon gas carried by this pipeline have not been resolved.

All gas extracted from shale contains radon, an inert radioactive gas which is the leading cause of lung cancer among non-smokers. The cancer risk from radon increases when exposure is repeated and more spread out over time, even if the exposure is at very low levels.

Radon mixes with the methane in what we call "natural" gas and travels through delivery pipelines to reach our kitchen stoves, gas dryers and boilers. This pipeline will carry fracked Marcellus shale gas, and it just so happens that the Marcellus Shale is one of the most radioactive shale plays in our country. In fact, geologists look for the "hot spots" to find where natural gas deposits might be rich. Radon also has a half-life of about 3.85 days, and since the Marcellus Shale is so close to NYC, the radon being carried will not have decomposed.

IND155-2 Radon decays to equally radioactive and dangerous "progeny," including polonium and radioactive lead, before decaying to regular, non-radioactive lead. When radon is breathed in, the radon itself is exhaled, but the radon progeny deposits in the lungs, where it causes cancer. Because radon is a "heavy" gas, it tends to gravitate towards the floor, making it a particular danger for children and pets.

Radon progeny can also plate out on the sides of gas pipes, creating "hot" radioactive pipes which are an exposure hazard, and a problem for disposal.

In 1986, the EPA set a limit for exposure to radon in air at 4 picocuries per liter. However, because of increased exposure to many other kinds of radiation in today's world, both Johns Hopkins University and the World Health Organization have indicated that 2.7 picocuries per liter would be a better standard. Of course, there is no truly safe level of exposure.

IND155-3 Studies at wellheads in the Marcellus are very limited, but have shown the potential for as much as 150 picocuries per liter at the wellhead. Suffice it to say that people within the industry use the radioactivity of the Marcellus Shale as a "marker" to distinguish it from gas from other locations!

Radon levels in NYC apartments will become higher as the proportion of Marcellus gas in our supply increases. Because this source is physically much closer to New York than other sources, the radon has less time to decay in transit. Radon has a half-life (loses half of its radioactivity) of 3.85 days. Gas from the Gulf Coast takes 4-8 days to reach New York City, but gas from the Marcellus, which is so much more radioactive to start with, would get here much faster, in less than a day. So this makes it even more likely that we will be exposed to gas with dangerous levels of radon.

IND155-4 Voluntary citizen radon testing over the past two years has shown that NYC kitchens typically have radon levels less than .3 picocuries per liter. We want to keep it that way! But with radioactive Marcellus shale gas coming to NYC from both the Rockaway Pipeline, and the Spectra Pipeline into Manhattan, it has been estimated that an additional 30,000 deaths from lung cancer could result. Assemblywoman Linda Rosenthal considers this to be such a threat to New Yorkers' health that she introduced a bill, A6863,

http://assembly.state.ny.us/leg/?default_fld=&bn=A06863&term=2013&summary=Y&text=Y

which would require suppliers of natural gas to guarantee that gas delivered to NYC does not contain unacceptable levels of radon.

<http://www.youtube.com/watch?v=PCBdNkrb4Bg>

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IND155-1 See the response to comment CM1-21.

IND155-2 See Section 4.11.1.5 of the EIS and the responses to comments CM1-21, CO5-8, and CO11-23.

IND155-3 See Section 4.11.1.5 of the EIS and the responses to comments CM1-21 and CO11-23.

IND155-4 See Section 4.11.1.5 of the EIS and the responses to comments CM1-21 and CO11-23.

IND155 – Alice Zinnes (cont'd)

20131209-5044(28967305).txt

The FERC draft EIS has very little to say about radon. Section 4.11.1.5 of the dEIS states as follows:

"Radon is a naturally occurring radioactive gas that is odorless and tasteless. It is formed from the radioactive decay of uranium (Agency for Toxic Substances and Disease Registry, 2011). Radon can be contained in fossil fuels including natural gas. Since radon is not destroyed by combustible burning natural gas containing radon can increase the level of radon within a home (Agency for Toxic Substances and Disease Registry, 2010). Several factors limit the indoor exposure to radon from natural gas. Radon's half-life, defined as the time it takes for the element to decay to half its initial concentration, is relatively short (3.8 days). The time needed to gather, process, store and deliver natural gas allows a portion of the entrained radon to decay, which decreases the amount of radon in the gas before it is used in a residence. The required venting of appliance exhausts from water heaters, furnaces, and other appliances also limits potential exposure pathways to radon emissions.

"while the FERC has no regulatory authority to set, monitor, or respond to indoor radon levels, many local, state, and federal entities establish and enforce radon exposure standards for indoor air. It is expected that the combustion of gas transported by the Projects would comply with all applicable air emission standards. In the unlikely event that these standards are exceeded, the necessary modification would be implemented to ensure public safety."

IND155-9 In other words, FERC has not been able to justify permitting this pipeline. FERC admits that because the gas will travel only 1.5 days, the radon, which has a half-life of 3.85 days, will not have decayed by the time it reaches our homes. FERC also claims that venting will reduce exposure, but unfortunately many kitchens have neither windows nor functioning vents. Most incredibly, FERC simply says that if there is a problem, it will somehow be dealt with. How any problem will be dealt with, however, is not explained. Before permitting this pipeline, solutions to all potential problems must be found.

IND155-5

See Section 4.11.1.5 of the EIS and the responses to comments CM1-21, CO5-8, and CO11-23.

IND156 – Alice Zinnes

20131209-5045(28967306).txt

IND156-1 Alice Zinnes, Brooklyn, NY.
FERC must not approve the Rockaway Lateral Delivery Project to be constructed by Williams Transco and National Grid because as part of the Rockaway Project, Transco plans to build a metering and regulating station inside historic hangars 1 and 2 in Floyd Bennett Field, located within GNRA. Although Transco will restore the facades, for the duration of this company's use, the interiors of hangars 1 and 2 will be off limits to the public.

Floyd Bennett Field and these hangars are historically significant because:
o Floyd Bennett Field was the first municipal airport in New York City
o Because of its unusually long runways and fair weather conditions, Floyd Bennett Field became noted as a prime airport for the experimental fliers establishing speed and distance records. Pioneers aviators Charles Lindbergh and Amelia Earhart frequented the field.
o During World War II it was the busiest Naval Air Station in the United States.
o Floyd Bennett Field still retains the architectural design and historic integrity of an early municipal airport.
<http://www.cr.nps.gov/nr/travel/aviation/flo.htm> "Floyd Bennett Field Historic District."

IND156-2 Two years ago, the federally-convened Floyd Bennett Field Blue Ribbon Panel recommended that Gateway "preserve and herald the site's aviation history," advising that "the remaining derelict hangars should be rehabilitated and repurposed as flexible and multi-purpose spaces, possibly as space for historic aircraft storage or viewing or other commercial uses" and that "in the long-term, aviation activity should be relocated [from elsewhere in the field] to Hangar Row". The panel believed the concentration of aviation-related and cultural activities in Hangar Row would serve "as a visible draw to the site." Additionally, the panel asked Gateway to "remove inappropriate uses", citing the NYC Police Department driver training as an example, and recommended establishment of a "moratorium preventing any inappropriate uses."

http://www.rpa.org/pdf/FBF_Report_Final.pdf

Now Transco proposes to build a metering & regulating station within two of these historic hangars. To understand what that might look like, we turned to a federal agency that knows a lot about these matters—Pipeline & Hazardous Materials Safety Administration (PHMSA). In layman's terms, they advise local governments and developers to think twice before building near pipeline appurtenances (m&r facilities, for example) because they likely will be the source of noise, odor, emissions and the occasional accident.
https://primis.phmsa.dot.gov/comm/pipa/pipa_practice_ND18.htm

So, if one might be wise to forgo development near the source of such annoyance and/or hazards, why would one invite the source of such annoyance/hazards to an area that had already been developed?

Given the historic nature of this airfield and these buildings, and the vision so recently set forth by the Blue Ribbon Panel, does the Transcontinental plan (and what we know of metering & regulating facilities) measure up to the vision?

IND156-3 The "construction and operation of the Projects could also potentially affect historic properties. Direct effects could include destruction or damage to all or a portion of an archaeological site or alteration or removal of a historic property. Indirect effects could include the introduction of visual, atmospheric, or audible elements that affect the setting or character of a historic property."

(From section 4.10.4, page 4-132 of the Draft EIS submitted by FERC.)
In Section 4.11, page 4-130 Transco writes that "the simultaneous operation of multiple pieces of equipment or equipment operating at distances closer than 5 to 10
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IND156-1

Your opposition to the Rockaway Project, and to use of the hangars for the M&R facility, is noted. The public does not currently have access to the hangars because the buildings are deteriorated.

IND156-2

Comment noted. See the response to comment CM1-34. The M&R facility would be designed, constructed, operated, and maintained in accordance with or to exceed the DOT's Minimum Federal Safety Standards in 49 CFR Part 192 and with applicable New York City codes. Transco's proposed rehabilitation of the hangars is discussed in Section 4.10.1 of the EIS. Pipeline safety is discussed in Section 4.12 of the EIS.

IND156-3

Comment noted. Transco's CPP is described in Sections 4.10.1 and 4.11.3 of the EIS. The Section 106 process is discussed in Section 4.10.1 of the EIS.

IND156 – Alice Zinnes (cont'd)

20131209-5045(28967306).txt

IND156-3 Feet (from the Hangers) could potentially cause damage." The study recommends that the engineering design for the Rockaway Project identify vibration level thresholds for the structures, that Transco prepare and implement a Construction Protection Plan (CPP) to protect the integrity of the hangar complex during construction, and that the plan include vibration monitoring.

Transco further writes that if the FERC, in consultation with the National Parks Service "determines that a historic property would be adversely affected by the Projects and (the damage) could not be avoided, Transco would be required to prepare a treatment plan in consultation with the appropriate parties to mitigate adverse effects."

In other words, Williams Transco knows that construction may damage the existing historic hangers, and that they will very likely need to create a plan to mitigate damage, but only if the National Parks Service and FERC require them to do so.

IND156-4 In December 21, 2010 the Floyd Bennett Field Blue Ribbon Panel's recommendations stated "Floyd Bennett Field (FBF) should be an iconic urban National Park, simultaneously preserving significant natural and cultural resources, serving as a "gateway" to the National Park experience for New York City's residents and visitors of all ages, and helping to address the open space deficit of southern Brooklyn and Queens. . . The historical and habitat assets of FBF should be restored and made accessible. Incompatible uses should be moved out or scaled back." (<http://www.rpa.org/Floydbennett/FBF-Task-Force-Recommendations.pdf>)

Current activities at Floyd Bennett Field include

- o Youth camping
- o Nature trails
- o A model airplane flying field
- o Sports fields used by the Public School Athletic League
- o An archery range
- o Aviator Sports (uncomfortably close to Hangers 1 and 2)
- o The Floyd Bennett Garden Association of over 400 gardeners (merely 200 feet from Hangers 1 and 2)
- o A cricket club
- o The Historic Aircraft Restoration Project, and
- o The Gateway Environmental Education Center run by the NYC Department of Education and NYU.

Finally, no pipeline as dangerous as this one should be in a National Park.

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IND156-4

Comment noted. See the response to comment CM1-34. Pipeline safety is discussed in Section 4.12 of the EIS.

IND157 – Edith Kantrowitz

20131209-5046(28967307).txt

Edith Kantrowitz, Brooklyn, NY.
IND157-1 The draft EIS does not give proper consideration to the effect that flooding from hurricanes and other storms may have on this pipeline project. Section 4.1.4.2 of the dEIS (on Hurricanes) states:

"An analysis by the New York State Emergency Management Office (2005) found that the entire Rockaway Peninsula and much of the Brooklyn-Queens area could be flooded due to Category 3, 4 or 5 hurricanes depending on the direction of prevailing winds at landfall, distance from the eye of the storm, eye wall intensity, and tide level, but the risk of flooding during a major hurricane event is difficult to predict. The Intergovernmental Panel on Climate Change considers it likely that hurricanes will become more intense as a result of climate change and sea level rise, but the total number of storms could decline (Pachauri and Renninger, 2007)."

During Superstorm Sandy, floodwaters surged to a height of 14 feet. The metering and regulating station proposed in this project would be at an elevation of 16 feet, with the equipment raised above floor level by one foot. This was apparently based on old "100 year floodplain" estimates, before Superstorm Sandy, and before the dramatic climate change we are now seeing. Since it is now predicted that hurricanes will be increasing in intensity, it seems very likely that we will soon have a storm that would bring at least 17 feet of water to the metering and regulating facility, having a dangerous effect on the regulating equipment.

According to the president of the New England Gas Workers Association:
IND157-2 "water can cause the regulator to be stuck open completely, in the wide open position. If that happens, it dramatically increases the pressure and it can cause serious problems down the line. If gas is coming into a home or a business at a much higher pressure than it's supposed to, it can cause a fire or even an explosion. In addition, prolonged exposure to water can contribute to accelerated corrosion of the regulators, causing gas leaks that could trigger an explosion or fire." The regulator function is supposed to lower the pressure in the gas line from the 960 pounds per square inch, to the 360 pounds per square inch more appropriate for local distribution. But if pressure is not stepped down properly because of flood damage, the results could be catastrophic.

IND157-3 Additionally, if there is a major fire at the metering and regulating station, or the surrounding pipelines, FDNY would be ill prepared to deal with it. Firefighters have repeatedly said that in Floyd Bennett Field, many of the hydrants don't work and others have insufficient water pressure to respond to a fire. And the National Parks Service, which oversees Floyd Bennett Field and Gateway National Recreation Area, admitted that the broken hydrants have not been repaired since the New York Post reported about their condition last year. "In terms of the fire hydrants, nothing has changed," said National Parks Service spokesman John Warren. (Floyd Bennett Field Hydrants Don't Work, Critics Say Residents blast Floyd Bennett Field pipeline plan, by Colin Mixson http://www.brooklyndaily.com/stories/2012/32/mm_floydbennett pumps_2012_08_10_bk.html)

IND157-4 In short, this pipeline project is too hazardous, and should not be approved. The lack of adequate preparations for storm surge flooding is only one more reason why this pipeline endangers our safety, and should not go forward.

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IND157-1 See the response to comment CM1-8.

IND157-2 See the response to comment CM1-50.

IND157-3 See the response to CM2-27.

IND157-4 Your opposition to the Rockaway Project is noted.

IND158 – Rev. Ieva Zadina

20131209-5047(28967308).txt		
IND158-1	<p>Rev. Ieva Zadina, Brooklyn, NY. I am a resident of Brooklyn and therefore also a stakeholder in Gateway National Recreation Area, the national park of which we are so proud and which makes the city eminently livable. I am advocating against the proposed Rockaway Lateral Pipeline.</p> <p>I have been studying the questions around the Rockaway Pipeline for months and have read many of the comments and interventions from stakeholders. There is no need for me to repeat the cogent arguments, with which I agree, against building the Rockaway Pipeline. The majority of the American people no longer believe that fossil fuels will provide energy independence – only renewables will do that. Common sense and sanity dictate that the Rockaway project will be harmful to millions of New Yorkers, to the city's immediate environment, and ultimately, because of climate change, to all life on the planet.</p>	IND158-1 Your opposition to the Rockaway Project is noted. Renewable energy alternatives are discussed in Section 3.2.2 of the EIS.
IND158-2	<p>Therefore, what is left is to comment on FERC itself in its handling of the Rockaway Pipeline project. Is it doing its job to protect the American people? Indeed, is FERC in every instance operating lawfully? Lawyers are looking into this. But there are matters that appear dubious to ordinary citizens.</p> <p>THE PUBLIC TRUST. My understanding is that from hundreds of applications for approval of similar projects, FERC has denied only two. How can this be? What are the odds? I cannot know the full details of these other projects, but if they are at all comparable to what I know about the Rockaway Pipeline project and some others in our region, FERC should not have approved so many of them. Either FERC has been lax in its duties -- or actively corrupt. I do not want to believe the latter. The Rockaway project constitutes a test case for me, and I think for many others, who want to trust professional government agencies. I will give just two examples where I believe FERC is failing in its duty and possibly breaking laws.</p>	IND158-2 Comment noted. See the response to comment CM1-168.
IND158-3	<p>PURPOSE AND NEED. Regarding the Rockaway project, the EPA stated: "The EIS should include a full discussion of the purpose and the need of the proposed project, quantifying energy demand and the need for such facilities in the region." This is fundamental and has not been adequately discussed in the dEIS. Fewer and fewer New Yorkers believe that the city needs more fracked natural gas, and certainly not at the cost with which it is being extracted, distributed and burned. Instead of building expensive infrastructure for a fossil fuel that will add greatly to climate change, we should immediately use all available funds for developing renewable energy. We can do this. Mark Jacobson and his colleagues have a good initial plan for New York State which can be refined when it is put into practice. In addition, we need to implement known ways to conserve energy. After Superstorm Sandy, New Yorkers have a right to expect a more thorough analysis of the environmental hazards of this project. How crazy is it to build a pipeline in a vulnerable and densely populated area devastated by a storm that did not even reach hurricane status? We are talking about life and death here, as well as great hardships and billions of taxpayer dollars for recovery. What is the duty of federal agencies to prevent predictable calamities?</p>	IND158-3 See the response to comment CM2-32. Energy conservation and renewable energy alternatives are discussed in Sections 3.2.1 and 3.2.2 of the EIS.
IND158-4	<p>RADON. FERC states in the dEIS: "while the FERC has no regulatory authority to set, monitor, or respond to indoor radon levels, many local, state, and federal entities establish and enforce radon exposure standards for indoor air. It is expected that the combustion of gas transported by the Projects would comply with all applicable air emission standards; In the unlikely event that these standards are exceeded, the necessary modifications would be implemented to ensure public safety." As with many issues, FERC is accepting the promises of Williams Transco to do everything correctly and safely, without having to prove the efficacy of their safety standards. However, the terrible safety record of Williams-Transco shows that they are not capable of ensuring public safety – either because they cut corners to reduce expenses or because they really don't care about preventing bad effects until they are caught violating safety standards or until actual harm occurs that then belatedly must be remedied. Cautionary standards should be upheld, not</p> <p>Page 1</p>	IND158-4 See the response to comment CM1-21.

IND158 – Rev. Ieva Zadina (cont'd)

IND158-1
(cont'd)

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remediation after ill effects. FERC's job is to prevent a public health crisis and in general to act in the public interest by heading off serious problems to public welfare in the early stages of the approval process. with regard to the danger of radon, 1) FERC should explain in the EIS why it "expects" that the gas delivered will comply with standards, when the gas supply being delivered from the radon-rich Marcellus shale will clearly be different from the gas supply historically delivered. 2) FERC should demand that Williams and National Grid detail the exact source, radioactivity level, and percentage of the gas mix they intend to deliver. 3) FERC should outline exactly what modifications would be implemented if radon levels exceed accepted levels, by what agency that will be done, and how quickly. 4) FERC should explain how and when residents will be notified that their gas supply has exceeded regulated limits. 5) FERC should deny approval of this pipeline until the builder and utilities prove that the gas delivered will not contain dangerous levels of radon.

IND159 – Alice Zinnes

20131209-5048(28967309).txt

Alice Zinnes, Brooklyn, NY.

Less than one year ago, Hurricane Sandy crashed through the Rockaways, South Brooklyn, Staten Island, the Lower East Side, and Long Island and New Jersey's shores. The effects of Superstorm Sandy are still being felt in some areas. During the storm, many people ran out of medications, food and other necessities. To this day, many homes still suffer from mold, and countless people have been displaced, some permanently.

The Draft Environmental Impact Statement (dEIS) Section 4.1.4.2 (on Hurricanes) states:

"An analysis by the New York State Emergency Management Office (2005) found that the entire Rockaway Peninsula and much of the Brooklyn-Queens area could be flooded due to category 3, 4 or 5 hurricanes depending on the direction of prevailing winds at landfall, distance from the eye of the storm, eye wall intensity, and tide level, but the risk of flooding during a major hurricane event is difficult to predict. The Intergovernmental Panel on Climate Change considers it likely that hurricanes will become more intense as a result of climate change and sea level rise, but the total number of storms could decline (Pachauri and Renninger, 2007)."

IND159-1 | "Transco states that the ability to forecast hurricanes several days in advance would allow it to ensure the safety and integrity of its system... Unfortunately, during Superstorm Sandy, the water surged to a height of 14 feet. The M&R station is at an elevation of 16 feet, and the equipment is to be raised above floor level by one foot. Raising the M&R station just 2 feet above Superstorm Sandy's surge level does not ensure that the station will be above a storm of greater force than Sandy.

Even according to FERC (see the dEIS in Section 4.1.4.3 on Flooding), "Transco conducted a site-specific land survey of the proposed M&R facility site to determine the elevations of the site relative to FEMA's designated 100-year floodplain (i.e., the area with a 1 percent proposed probability of flooding in a given year). The survey determined that the lowest floor elevation inside the proposed M&R facility is approximately 2.9 feet above the 100-year floodplain delineated in the recent ABE mapping (FEMA, 2012b)."

In addition, the pressure entering that M&R facility will be tremendous. The gas would come into the Rockaway Pipeline from the Lower New York Bay pipeline (running along the coast) at up to 960 pounds per square inch. The regulator's job is to lower that pressure.

IND159-2 | But according to the president of the New England Gas Workers Association: "Water can cause the regulator to be stuck open completely, in the wide open position ... If that happens, it dramatically increases the pressure and it can cause serious problems down the line. If gas is coming into a home or a business at a much higher pressure than it's supposed to, it can cause a fire or even an explosion. In addition, prolonged exposure to water can contribute to accelerated corrosion of the regulators, causing gas leaks that could trigger an explosion or fire."

IND159-3 | In fact, firemen tell us that in Floyd Bennett Field, many of the hydrants don't work and others have insufficient water pressure to respond to such a conflagration.

IND159-4 | Given the record thus far of this company, how confident do we feel that they can guarantee our safety? Here is a list of some of the 35 reportable accidents they have had since 2006:
 o Appomattox, VA, September 2008 – pipeline fails, blowing a fireball that scorched an area 1,125 feet in diameter, leveling two homes and injuring 5 people and damaging 100 homes.
 o Alabama, 2011 – pipeline ruptures, shooting flames 100 feet into the air for 90 minutes after the pipeline was shut off; the explosion is heard more than 30 miles away.
 o Springfield Township, PA, March 2012 – explosion blows hole in roof of compressor station, shakes homes a half mile away.

Page 1

IND159-1 See the response to comment CM1-8.

IND159-2 See the response to comment CM1-50.

IND159-3 See the response to comment CM2-27.

IND159-4 Comment noted. Pipeline safety, including Transco's incident history, is discussed in Section 4.12 of the EIS.

IND159 – Alice Zinnes (cont'd)

IND159-4 | 20131209-5048(28967309).txt
(cont'd) | o Ellicott City, MD, July 2013 - Natural gas pipeline explodes, witnesses
describe the sound as that of a jet plane landing on the roof. Fortunately nobody
was injured.
The Barrier Peninsula

IND159-5 | Finally, although the job of the M&R station is to meter and then regulate the
enormous pressure in the pipeline, little is being done to protect the people of the
Rockaways, where the gas is coming in full force, in a place where the sea floor was
upheaved high onto the land and the boardwalk was tossed against buildings like so
many sticks. Clearly, a high-pressure pipeline be on a barrier peninsula already
shown to be so vulnerable to extreme weather cannot be safe.

IND159-5

Comment noted.

IND160 – Jessica Roff

20131209-5049(28967321).txt

- Jessica Roff, Brooklyn, NY.
- IND160-1 The fact that FERC approves more than 99% of all pipelines and that FERC states in the draft EIS that this project "would result in limited adverse environmental impacts, which would mostly occur during construction," are clear indications that FERC is not actually determining what is necessary and of "public convenience." There is massive opposition to this unnecessary pipeline. I am writing these comments to the draft Environmental Impact Statement under protest because I do not believe that this is a fair and open comment period and that these comments will be duly considered. If they were to be, then the Spectra Pipeline, with over 5000 comments in opposition to its construction, would have been stopped. Please prove me wrong.
- IND160-2 The "limited adverse environmental impacts . . ." were assessed for drilling and dredging in the winter. After the DEIS was complete Williams Transco completely changed their proposal and now plan to drill in the summer. There needs to be a completely new EIS performed to address this new reality. Plus, there needs to be much more consideration of how the dredging up of the ocean floor will impact ocean life and people, as people are not addressed in that part of the assessment. But where the dredging operations will take place will dig up loads of toxic materials dumped over decades on to the ocean floor. Having all those toxins stirred up and mixed in with the ocean water will undoubtedly cause problems for ocean life, plus now that it will be done in the summer months there will be large numbers of people spending extended periods of time in the water and exposed to the toxins.
- IND160-4 Additionally, Hurricane Sandy did massive amounts of structural damage all along the beaches and the shore line. There needs to be an extensive study done to determine how much damage was done underwater to the structural integrity of the peninsula itself before Williams Transco starts dredging up so much of the ocean floor and operating such heavy machinery.
- IND160-5 There must be a new EIS performed to include studying the impacts of moving the project's construction to the summer from the winter and to address how Hurricane Sandy impacted all the aspects of construction in the Rockaways.

Page 1

- IND160-1 See the response to comment CM1-168.
- IND160-2 See the response to comment CM1-14.
- IND160-3 See the response to comment CM1-85.
- IND160-4 Comment noted.
- IND160-5 See the response to comment CM1-14.

IND161 – Karen Orlando

12/8/2013

Comments on Draft EIS on Alternatives:

Ms. Bose,

- IND161-1 1. Section 3.3.9 In evaluating a Transco/National Grid system alternative, has FERC overstepped its jurisdiction? According to FERC the part of this system alternative under their jurisdiction would involve expansion of the M&R in Long Island and the existing NYLBL would need to be taken out of service, hydrostatically tested and uprated. The only part of this alternative that would fall under FERC's jurisdiction would involve less ocean impact as stated by FERC. Yet FERC has evaluated that this alternative would take longer and would involve a longer pipe. In doing so, the pipe they are referring to would be the LDC's, National Grid's and not under their jurisdiction. The evaluation of this Transco/National Grid system alternative is particularly offensive as FERC **did not include any part of National Grid's Project in the current draft EIS**. As part of the Northeast Connector/Rockaway Lateral Project National Grid will own and operate equipment in the M&R, will have more pipes that run out of the M&R than Transco and the 26 inch pipe from the Rockaways to the M&R more properly should have been looked at as part of the Rockaway Lateral/Northeast Connector projects. National Grid's assertion that the 26 inch would act as a secondary backfeed if the Rockaway Lateral/Northeast Connector is not built has obviously been proven to be nonsense as National Grid is insisting right now that they need the Rockaway Lateral/Northeast Connector in service by winter season 2014. This negates the claims National Grid made in the documents they filed upon which the Mayor's Negative Declaration on that project relied. Everyone including FERC probably knows as a secondary backfeed from an 8 inch to a 12 inch pipe that 26 inch pipe is overbuilt. Further, FERC has reviewed National Grid's ability to deliver to the Rockaways in this system alternative, but Transco's projects are intended to deliver to Brooklyn not the Rockaways.
- IND161-2 2. Section 3.3.9 The proposed Northeast Supply Link is not proposed any longer. I believe it is online and while FERC has acknowledged that it delivers into Brooklyn increased volumes, neither FERC nor Transco have answered how much this supply is. The total incremental supply provided by the Northeast Connector to the Rockaway Lateral to National Grid's BQI is 100,000dths. How much increased supply does the Northeast Supply Link uprate provide into Brooklyn by comparison? This was asked and unanswered. While this operational project does

IND161-1

We believe our analysis demonstrates that the Long Beach Delivery Point Alternative would result in greater impacts than the Rockaway Project. Also see the response to comment CM1-56.

IND161-2

We believe our analysis demonstrates that the Northeast Supply Link Project would not meet the objective of the Projects.

IND161 – Karen Orlando (cont'd)

IND161-2 (cont'd)	not supply a new delivery point into Brooklyn, it does provide incremental gas supply to Brooklyn.
IND161-3	3. 3.3.8 Port Ambrose Project: On Sept 28, 2012 MarAd and USCG received this application which is beyond public scoping. The annual average the project aims to deliver is 400 MMcf/d. The application claims up to and over 600 mmcf/d peak day. Unless the existing NYLBL is operating way under capacity, which is unreasonable to assume given the market it delivers to and according to all information provided by the applicant on their existing NYLBL, this project appears to be reliant on the Rockaway Project being built and operational in order to be viable. It has been improperly viewed as an alternative. It appears to be a connected or supplemental project. FERC has been asked to provide either a supplemental to the draft or revised draft to the Rockaway Lateral/Northeast Connector projects in order to include the further impact on NY Bight species such as Right Whale, sturgeon, and other marine mammals which would also likely also be affected by both construction and operation of Port Ambrose. This is the same biological resource that would be impacted in nearby waters.
IND161-4	4. 3.5.3 FERC has presented conflicting information about this location. In one moment they say this alternative would require alienation of parkland, in another they say that NYC has concerns about conflicting land use as portions of the site have been ceded to the NCDOT. This location is not located in USFWS Significant Land Habitat Complex as compared to the preferred M&R site which is. Floyd Bennett Field is listed by NYC Audubon as a significant birding area. Alternative 3 is an area used for park vehicles and equipment. These are visible from Flatbush Ave and the M&R would be no more an eyesore than they are. Claims of secondary impact on land uses seem erroneous considering vehicles could easily be moved to another location. This location would likely not involve the potential for any precedent like the preferred location in historic hangars and from existing land uses (next to a parking lot and the belt parkway, away from users of Marine Park Golf Course) seems like the most appropriate place for a metering and regulating station. The city has already deemed the land so invaluable to the golf course purpose they have ceded some to DOT and parked trucks there etc.
IND161-5	Further comments on alternatives: As the National Park Service has not properly been acting as a cooperating agency, secondary impacts that are likely to come from placing the M&R in the hangars such as further inappropriate, industrial and or hazardous uses or leases in the park has not been included.

IND161-3 See the responses to comments CM1-43 and IND43-1.

IND161-4 Your preference for Alternative Site 3 is noted.

IND161-5 Comment noted. See the response to comment CM1-34.

IND161 – Karen Orlando (cont'd)

IND161-5
(cont'd)

This use is not compliant with GMP and appropriate uses for historic or community flexible space as described in the draft EIS on the GMP. Public meetings as part of the Floyd Bennett Field Blue Ribbon Panel, produced the call for a moratorium on inappropriate uses of Floyd Bennett Field, at the very same time NPS kept plans for this M&R from the public. The preferred location seems to be inviting NPS to operate outside of the law and is likely to lead to litigation. The preferred location involves a land use change in Historic Hangar Row, Hangars 1&2 a contributing element of the National Register listed Floyd Bennett Field.

IND161-6

In testimony to Senate Subcommittee, Stephanie Toothman stated the park had not yet found a suitable or appropriate use for these hangars. There is no evidence that NPS had or has ever sought one either as Barbara Pearson and Joseph Bonesarrios intervening documents state. Alternatives were suggested as part of the Floyd Bennett Blue Ribbon process including relocating the HARP program where veterans restore historic aircraft or multi-use space. Placing an industrial facility, which operates under regulations by a department with Hazardous substance in its title, PHMSA, in this location may impede future plans for the area as defined in the future GMP as well. It may effect future uses of hangars 3&4. We can only guess what will be suggested next.

Placing an industrial facility, which operates under regulations by a department with Hazardous substance in its title, PHMSA, in this location may impede future plans for the area as defined for this zone in the future GMP as well. So far there has been no discussion whatsoever of what

IND161-7

is involved with maintenance events, any releases etc. Even without seeing a risk assessment it is likely that hangars 3&4 and parts of the surrounding areas which include vegetated areas as well as a picnic area, gathering places and the community garden would be in any catastrophic blast zone.

IND161-8

Further **zero construction mitigation** measures have been planned or are discussed in the draft EIS for construction of the M&R, particularly for pile driving, cement breaking for pipeline installation or any other loud construction associated with the M&R construction. The National Park Service said in written testimony that construction impact would be minimal yet there is no evidence that NPS has asked for any mitigation measures for the M&R construction whatsoever

IND161-6

See the responses to comments CM1-12 and CM1-34. Maintenance activities are discussed throughout the EIS.

IND161-7

The risks of the pipeline and M&R facility and safety impacts are discussed in Sections 4.12.2 and 4.12.3 of the EIS.

IND161-8

Construction procedures for the M&R facility are discussed in Section 2.3.2 of the EIS. Mitigation measures, such as the CPP and restoration of the hangars, are discussed throughout the EIS.

IND161 – Karen Orlando (cont'd)

IND161-8
(cont'd)

according to park use patterns. Is NPS a cooperating agency with regard to the draft EIS or not?
They don't appear to be.

Thanks,

Karen Orlando

I am certifying that all on the servicelist have received this document

IND162 – Barbara Pearson

20131209-5073 FERC PDF (Unofficial) 12/7/2013 9:47:38 AM

Comment on draft EIS in docket CP13-36-000

IND162-1 On page 1-6 the draft EIS states: The NPS will review the draft EIS for consistency with NPS NEPA standards.

I take the Department of the Interior's response that they have no comment on the draft EIS to mean that NPS has no comment. It is therefore my opinion that NPS has not done the job the EIS states it would do.

Please refer to the references below from NPS's DO-12 Handbook document on NEPA compliance and my comments regarding how these references should be applied to FERC's EIS in this docket.

4.2 Criteria for Significant Impact

If something your park is proposing might have a significant impact on the human environment, you must prepare an EIS. It is important, then, to understand how the significance of an impact is gauged. Although significance may often be a subjective judgment, to the maximum extent possible it must be based on the scientific evidence and public input that NEPA provides. (Emphasis added.)

Continuing on the next page in section B, "Criteria", NPS is directed to consider:

(6) Whether the action may establish a precedent for future actions with significant effects, or represents a decision in principle about a future consideration.

NPS has done nothing to satisfy the need for information nor quell the public unease about the effect their leasing of the hangars has in setting a precedent not only for the use of historic structures in national parks but the use of any existing structures or the building of new structures for an industrial use on national park land.

IND162-2 NPS has the information required to satisfy this requirement of their NEPA process. I have asked the FERC before to explore this aspect of the lease and I now ask that the FERC require NPS to

IND162-1 Comment noted.

IND162-2 Existing or proposed industrial facilities on NPS lands are not the subject of this EIS.

IND162 – Barbara Pearson (cont'd)

20131209-5073 FERC PDF (Unofficial) 12/7/2013 9:47:38 AM

IND162-2
(cont'd)

supply information regarding the existence of industrial facilities in national parks, specifying each facility, what park it is in and whether that facility existed before the park's creation or was added afterwards.

If NPS feels the requirement is burdensome for them, they may opt to simply supply a list of all leased facilities throughout the entire system which I and FERC and anyone else who is interested can then use to research this question.

Barbara Pearson

I certify service to all parties on the service list.

IND163 – Barbara Pearson

20131209-5074 FERC PDF (Unofficial) 12/7/2013 7:11:45 AM

Ms. Bose:

IND163-1 Below are minutes from a meeting held in June 2011 during the pre-file stage of this project. The project completion date is "anticipated" by both National Grid and Transco to be Fall 2014. In recent filings with the FERC, Transco has made it sound like this date is a contractual obligation yet from what I've been reading, it sounds rather loosey-goosey to me. It also doesn't appear to necessitate that FERC and NPS allow this project to occur during the worst possible time of the year that it could.

Since Transco has indicated that the FERC needed to approve their application without delay so as to allow Transco to meet their "contractual obligation" with National Grid, I request that the FERC require Transco to file proof that the in-service date of November 2014 is a contractual obligation and that there are significant negative sanctions in said contract for not meeting that in-service date.

<i>Office of Energy Projects – Division of Gas Environment and Engineering – Gas Branch 3</i>		Docket No. PF09-8-000
Meeting		
Date of Meeting: 6/10/2011		Project: Rockaway Delivery Point Project
Purpose: Interagency meeting at the New York City Mayor's Office of Operations, Office of Environmental Coordination (MOEC) to discuss the status of the Rockaway Delivery Point Project		
Name	Affiliation	
Kara Harris	Federal Energy Regulatory Commission (FERC)	
Steve Holden	Natural Resource Group	
Michael Delaney	New York City Department of Environmental Protection (NYCDEP)	
Terrell Estes	NYCDEP	
William Plache	NYC Law Department	
Robert Kulikowski	MOEC	
Katie Kendall	MOEC	
Don Harmon	Williams/Transco (Transco)	
Roberta Zwier	Transco	
Steven Dalton	National Grid	
Stephen Greco	National Grid	
Eileen Cifone	National Grid	

Meeting Summary:

IND163-1

Any contractual agreements between Transco and National Grid to deliver gas by a specified date are irrelevant in the context of NEPA review. The Commission is not bound by any agreement between Transco and National Grid to issue a decision on the Projects by any given date.

IND163 – Barbara Pearson (cont'd)

20131209-5074 FERC PDF (Unofficial) 12/7/2013 7:11:45 AM

Rockaway Delivery Point Project (PF09-8-000)
June 6, 2011

- MOEC described the City's expectations for National Grid's environmental review and provided an overview of the roles of the various city agencies in the coordinated review process.
- The FERC pre-file process was described, including the roles of the FERC staff and cooperating agencies.
- National Grid provided an overview of its proposed project and the anticipated schedule. The project would consist of two phases and has an anticipated completion date of Fall 2014.
- Transco provided an overview of its proposed project, the anticipated schedule, and briefly discussed the proposed construction methods and how the use of the horizontal direction drill method would avoid or minimize potential impacts. If approved, Transco's anticipated completion date for its proposed project is also Fall 2014.

IND164 – Barbara Pearson

20131209-5078 FERC PDF (Unofficial) 12/9/2013 8:39:19 AM

Barbara Pearson, Brooklyn, NY.

Ms. Bose

The following is the correct version of them comment I submitted on December 3, 2013.

IND164-I Recently you've received comments from the U.S Army Corps of Engineers, the U.S. Environmental Protection Agency and the U.S. Department of the Interior, none of which raised substantial concerns about the conclusions in the draft EIS.

Nowhere in their responses do any of these entities make it clear that they are aware that it contains assessments pertaining to impacts on wildlife and beach users that were based on a schedule that assumed construction would occur in a different timeframe than the one currently under consideration. I believe there should have been a disclaimer included in the draft EIS stating that some assessments of impact presented in the DEIS might be inaccurate and/or invalid based on the current construction schedule. I request that the FERC send a notification to all agencies and interested parties stating the following: 1) that the currently proposed construction schedule is not the one on which assessment of impacts on wildlife and beach users were based and 2) requesting that all agency responses submitted to FERC specifically state that the respondent is aware that assessed impacts may differ under the currently proposed construction schedule of spring and summer of 2014.

I apologize for submitting the wrong version of my comment.

Thank you.

IND164-1

See the response to comment CM1-14.

IND165 – Barbara Pearson

20131209-5080 FERC PDF (Unofficial) 12/9/2013 8:55:44 AM

Ms. Bose:

IND165-1 As Ms. Karen Orlando has pointed out to the FERC already, NPS is not mandated to assist in enhancing the natural gas supply of New York City.

The September 14, 2010 teleconference summary filed in this docket states: "NPS and Transco agree to work together to find to suitable sites for "the needed pipeline facilities". Transco expects there to be progress "very soon."" This statement and NPS's subsequent offering up of the hangars for the metering and regulating station for "the needed pipeline facilities" is indicative of an arbitrary and capricious decision on the part of NPS, as is their failure to consider both the appropriateness of the use of the hangars and the likely precedent it sets.

NPS and the courts say so themselves.

<http://www.nps.gov/protect/q and a.htm>

Generally, an agency decision will be considered arbitrary and capricious if the agency had (1) relied on factors which Congress had not intended it to consider, (2) entirely failed to consider an important aspect of the problem, (3) offered an explanation for its decision that runs counter to the evidence before the agency, or (4) is so implausible that it could not be ascribed to a difference in view or the product of agency expertise.

IND165-1

See the response to comment IND116-1.

IND166 – Joanne Steele

20131209-5084 FERC PDF (Unofficial) 12/9/2013 10:12:30 AM

Joanne Steele, Saint Remy, NY.

IND166-1 Is it enough to toss a bit of dirt on the welds? Who's inspecting the welds where gas leakage occurs and explosions happen?

IND166-2 There is no right to profit. There is a right to life, including to live with clean air, air without Radon. It is your LEGAL JOB to forbid radon. You can't do that you say. Therefore, DENY this project!

IND166-1 As discussed in Sections 2.3.1 and 4.12.1 of the EIS, welds would be non-destructively tested and then verified in the field by x-ray before installation is considered complete.

IND166-2 Comment noted.

IND167 – Asia Meshack

20131209-5099 FERC PDF (Unofficial) 12/9/2013 10:24:36 AM

- IND167-1 Asia Meshack, Brooklyn, NY.
Please demonstrate your responsibility to the public and to the protection of the climate and do not allow the dispensable and damaging Rockaway Pipeline to proceed. Climate change will only be exacerbated by this project. Is our memory of Sandy and the lessons learned from that climate change-induced storm so short?
- IND167-2 Surrounding New Yorkers with an expanding network of shale gas pipelines to bring fracked gas to markets here and overseas will not benefit us, only the fossil fuel industry. We don't need it.

Williams Transco has acknowledged that this pipeline will carry fracked gas from the Marcellus Shale. This will drive production from shale plays upstream and upwind of NYC, will increase the pressure to frack in NY State as well as Pennsylvania, and will help place in jeopardy the water supply and foodshed of millions, creating unacceptable health impacts, stressing local roads and local communities, and potentially turning many more formerly beautiful rural areas into an industrialized zone. We DO NOT WANT THIS for New York.
- IND167-3 Air pollution from the gasfields, and emissions from the pipeline and its metering and regulating station (outrageously sited near the Floyd Bennett Community Gardens) will not only cause health effects for humans, plants and animals, but will more than negate the purported "clean burning" advantage of natural gas.
- IND167-4 It's especially ironic that this pipeline full of greenhouse gas would be going straight through Rockaway, an area which has already been devastated by the effects of climate change in the form of superstorm Sandy. Also, far from
- IND167-5 providing "energy independence," the use of shale gas will make NYC more, not less, dependent on volatile supplies and prices of fossil fuels.
- IND167-6 We don't want or need a pipeline running through the Rockaways. Please recognize your responsibility to the public and to our long-term health, safety and security and don't allow this to proceed.

IND167-1 Comment noted.

IND167-2 See the response to comment CM1-6.

IND167-3 Comment noted. Air impacts associated with the Projects are discussed in Section 4.11.1 of the EIS. Air emissions from the development of natural gas resources in upstream areas are not the subject of this EIS.

IND167-4 Comment noted.

IND167-5 Comment noted.

IND167-6 Your opposition to the Rockaway Project is noted.

IND168 – Julianna Forlano

20131209-5111 FERC PDF (Unofficial) 12/9/2013 11:08:20 AM

IND168-1 Julianna Forlano, Rockaway Park, NY.
I am writing today to express my opposition to the Rockaway Delivery Lateral Project. I am certain that you have already heard the numerous reasons that this project is a danger to human and animal and plant life, as well as a threat to the local economy and arguably the national economy. It also seems that it is yet another danger to our democracy. I am keeping this letter brief, because I was in attendance at the public hearing FERC held here on the Rockaway Peninsula where the FERC representative admitted that FERC gets funding money from the very company that is pushing this project above and beyond the will of the people. How am I or any rational human being to believe that my voice, arguing against the injustice and inhumanity of this project, counts as much as those who's self interested voices are backed up by cash.

IND168-2 Reasons for stopping this project include the dredging up of long-buried toxins; the possibility of radon exposure; the dangers of explosion and flooding; the lack of necessity of this gas; the effects of more fossil fuel development on our climate, and how this pipeline and others will lock us in to more fracking rather than helping us transition to renewable energy, which we could easily do right here on the Rockaways.

IND168-3 If the project is approved, it is unthinkable that the company would want to insist and obtain permission for construction at the beach this spring and summer when human beings and native flora and fauna are in high density in the water. If this project was safe of such a boon to anyone but the oil industry, why would they segment of parts of this project in order to avoid federal review? I'd also like to mention the inappropriateness of siting this project in a national park.

IND168-4

IND168-5

Thank you for your attention. Please do the right, just thing here.

IND168-1 Comment noted.

IND168-2 Comment noted.

IND168-3 Your opposition to construction during summer is noted.

IND168-4 See the response to comment CM1-56.

IND168-5 Comment noted.

IND169 – Beth Perkins

20131209-5112 FERC PDF (Unofficial) 12/9/2013 11:15:07 AM

Beth Perkins, Rockaway Beach, NY.
IND169-1 As a member of the Rockaway community there are many of us who are concerned about the safety of this Rockaway pipeline. I've tried to understand and educate myself on this topic and feel that given all the facts, the city is continuing to go down a path that is not sustainable, devastating to our environment, very dangerous if there were any "accidents" and yet another example of our local government succumbing to big energy companies that are essentially railroading our community and putting us all at risk for a buck. Rockaway is taking the risk and having it's natural resources plundered yet again to give gas to other parts of the city. According to the representative from William Transco and National Grid it wont even serve Broad Channel! In addition it is insane that a 50 foot wide ditch needs to be dug in the ocean devastating sea life there for a 26 inch pipe. None of this makes sense and is no good for Rockaway and it's residence.
IND169-2 We currently live in an age where we have the technology and science to pioneer environmentally friendly energy sources such as solar, geothermal, wind... Why
IND169-3 can't a great city like New York forge as a front runner to begin working towards an infrastructure that would allow for these types of energy resources? This great city of New York should be an example of how to stop sucking at the tit of unsustainable, climate changing resources. Instead a pipeline is being shoved down our throats and going through a part of our city that has been so recently devastated by climate change. If this isn't an egregious slap in the face to all of us, I don't know what is.

IND169-1 Comment noted.

IND169-2 The offshore pipeline trench is expected to measure about 38 feet wide.

IND169-3 Comment noted.

IND170 – Lawrence

20131209-5146 FERC PDF (Unofficial) 12/9/2013 12:40:03 PM

Lawrence, Brooklyn, NY.

I have personally visited Bradford County, Pennsylvania and seen the environmental and economic devastation. Homes that cannot be sold, local businesses closed, no change in welfare rolls, water supplies disrupted and sometimes polluted and local roads ruined by big trucks that the towns cannot afford to repair. And jobs? Most go to outsiders who have driven up the rents beyond what locals can pay, and then they disappear.

IND170-1 Williams Transco has acknowledged that this pipeline will carry fracked gas from the Marcellus Shale. So it's not hard to figure out that this will drive production from shale plays upstream and upwind of NYC, will increase the pressure to frack in NY State as well as Pennsylvania, and will help place in jeopardy the water supply and foodshed of millions, creating unacceptable health impacts, stressing local roads and local communities, and potentially turning many more formerly beautiful rural areas into an industrialized zone. This is not what we want for New York, and it's not what we want for the National Seashore in Brooklyn.

IND170-1

Comment noted. See the response to comment CM1-6.

IND171 – Margery Schab

20131209-5158 FERC PDF (Unofficial) 12/9/2013 1:06:03 PM

Margery Schab, New York, NY.

Last December we traveled to the public School called Maple Academy which is located in the Rockaways. The school was seriously affected by the Hurricane Sandy. The children and their parents also lost their possessions. Even though it was 2 months since the storm when we drove there, we could see the ravages of the storm even well inland. We still saw Red Cross stations and by the sea, the electricity was still out and in December dining facilities were in large tents.

The school still ran on a generator and had no internet. The children had few uniforms so we initiated a clothing drive online to provide the children with school new uniforms.

After Sandy, we too were flooded from our apartment house in the Upper East Side and moved from the apartment for more than a week.

IND171-1 Today almost at the first anniversary of our trip to the Rockaways, FERC is considering to grant permission to Williams Transco to build a pipeline continuing from a proposed National Grid Pipeline and ending in the existing New York Bay lateral Line. In the meantime, FEMA has changed the flood zones and the area for the construction of this pipeline and the area designation as extreme risk for floods are one and the same.

IND171-2 Such construction, now designated for the summer thereby striking another economic blow to the community, will further environmentally damage the community. It is known that this pipeline will carry fracked Marcellus Gas and without this pipeline, the proposed Liquid Natural Gas Port Ambrose cannot be built.

IND171-3 It seems that Williams Transco has interests in pushing its business plans to the detriment of this community. Likewise Liberty Gas is claiming that their business model of investing \$600 Billion in in a Liquid Natural Gas port will ease for 2 months energy needs of the area. Energy needs can easily be erased with conservation. Both projects threaten the ecosystem of the area and further economically depresses the local community that has suffered enough.

IND171-4 Again it is the Government's mission to protect the people and to encourage local economic development. Corporate profits from companies based out side of the Rockaways will not aid the local community. Williams Transco is headquartered in Tulsa OK.

I attach a picture of the young students of Maple Academy. Real people will be negatively impounded by the construction of the Rockaway pipeline.

IND171-1 Comment noted.

IND171-2 Comment noted. See the responses to comments CM1-14 and CM1-43.

IND171-3 See the response to comment CM1-43. Energy conservation alternatives are discussed in Section 3.2.1 of the EIS.

IND171-4 Comment noted.

IND172 – Margery Schab

20131209-5162 FERC PDF (Unofficial) 12/9/2013 1:13:05 PM

- IND172-1 Margery Schab, Rensselaer, NY.
Methane is 78 more potent than CO2 over a 20 year period and we do not have 20 years to dawdle with our energy policies. Clean Ocean Action Executive Director, Cindy Zlot, said that only renewable energy sources, for example off shore wind, will not contribute to the pollution of the ocean. The New York Department of State issued a report in July, 2013. In its press release, it was stated that "The Governor's Energy Highway Blueprint specifically recommends site assessment in the Atlantic Ocean for the successful development of projects such as the Long Island-New York City Offshore Wind Project." If Off Shore wind development is feasible then our government should pursue this renewable source of energy in such an area with proven wind power. To permit construction of a gas pipeline is moving backwards. Moreover gas pipelines can leak and Natural Gas is mostly methane.
- IND172-2 Gas pipelines also means metering and regulating stations of which one will be sited near the Floyd Bennett Community Gardens. Such a facility will cause health effects for humans, plants and animals. I visited Minisink New York which is inland one and a half hours north of New York City. I visited a metering site and attach a photograph of the corroding pipes coming out of the ground. Minisink is not on the shores near the salt water of the oceans and salt water corrodes. The result will be methane leakage thus contributing to global warming. Another result could be the release of radon from these stations since the Marcellus Shale is known to have radon in its gas.
- IND172-3

- IND172-1 Comment noted. Renewable energy alternatives, including the referenced project, are discussed in Section 3.2.2 of the EIS.
- IND172-2 Comment noted.
- IND172-3 See the response to comment CM1-21.

IND173 – Jose

20131209-5175 FERC PDF (Unofficial) 12/9/2013 1:55:03 PM

Jose, Brooklyn, NY.
Hello,

IND173-1 | Rockaway is an area of natural beauty and a place for safe and clean recreational activities the plan to build a pipeline is of great concern. Despite any precautions take. The risk for environmental disaster and disruption to the community is not worth the supposed benefits.

IND173-1

Comment noted.

IND174 – Nancy Castleman

20131209-5185(28968896).txt

Nancy Castleman, Olivebridge, NY.
Greetings.

IND174-1 I'm writing today to urge you to deny the Transcontinental Gas Pipe Line Co's request to put a pipeline under Rockaway. I'm very frightened about what this would mean for this fragile barrier island -- as well as for Brooklyn -- and the rest of NYS. There are wildlife protected areas there, a public access beach, and many elderly residents, like my 92 year-old mother, who barely escaped Sandy's wrath.

A pipeline dug under Rockaway is a terrible idea. I shudder to think of the increase it would mean in the risk of pollution, what it would do to the land, what its effects will be on the tides, on the beach re-nourishment and fortification programs already in place, and on the risk of damage from the contents of the pipe line the next time there is a hurricane. Unless you were in a similar situation, you have no idea how horrible Sandy was for local residents. Why would you risk making it worse for them?

As for the possibility that this pipe line would be used to carry gas produced through fracking ... that would be an even worse risk. Please, not in NY and not through my childhood home. Preserve the peninsula and Floyd Bennett.

Many thanks, Nancy Castleman

Page 1

IND174-1

Your opposition to the Rockaway Project is noted. Impacts on wildlife are discussed in Sections 4.5 through 4.7 of the EIS. Land use impacts are discussed in Section 4.8 of the EIS. Pipeline safety is discussed in Section 4.12 of the EIS. See the response to comment CM1-6.

IND175 – Shyama Orum

20131209-5200 FERC PDF (Unofficial) 12/9/2013 2:40:46 PM

IND175-1 Shyama Orum, New York, NY.
I am writing to oppose the Rockaway Pipeline and to ask you not to approve it. This pipeline will carry fracked gas from the Marcellus Shale. It will increase production from shale plays in upstate New York and Pennsylvania. It will put the foodshed and water supply of millions of New Yorkers at risk, create unacceptable health impacts, stress local roads and potentially turn more beautiful rural zones into an industrialized zone, destroying local businesses such as tourism and farming. Air pollution from the gasfields and emissions from the pipeline and its metering station will cause health damage to humans, plants and animals.

IND175-2

IND175-3 At a time when we must reduce greenhouse emissions, this pipeline will in fact increase them. It is especially ironic that this pipeline will go through the Rockaway, which has already been devastated by the effects of climate change in the form of superstorm Sandy. We know that only sustainable energy sources like wind, tidal and solar power are the only way we can attempt to mitigate the impending climate catastrophe caused by burning fossil fuels. The only

IND175-4 entities that will benefit from this pipeline are the corporations that plan to build it. Their need for it is not based on providing a service to New Yorkers. Rather it is based on making a profit regardless of the negative consequences of the pipeline to New Yorkers. I ask you to serve the public, not the corporations and deny authorization for this pipeline.

IND175-1 Your opposition to the Rockaway Project is noted. See the response to comment CM1-6.

IND175-2 Comment noted. Air quality impacts are discussed in Section 4.11.1 of the EIS.

IND175-3 Comment noted. Renewable energy alternatives are discussed in Section 3.2.2 of the EIS.

IND175-4 The purpose and need for the Projects are discussed in Section 1.1 of the EIS.

IND176 – Allegra Dengler

20131209-5208(28969135).txt

Allegra Dengler, Dobbs Ferry, NY.
Dec 9, 2013

IND176-I I am writing to urge you not to approve the Rockaway pipeline. For me it's personal because I have been hit twice in the last year by abnormally intensified severe storms, fueled by climate change. The Rockaway pipeline is a conduit for death and destruction at both ends-when the gas comes out of the ground, and when it goes into the air.

My family had a little bungalow at in Breezy Point, near where this pipeline will go. 28 Fulton Walk was one of the houses burned to the ground during Sandy. Of the 345 houses completely destroyed by Sandy, only 38 were under construction by this summer. The damage now being done by climate change is much more costly than any possible "savings" we can get from fracked gas. I can't afford to rebuild 28 Fulton Walk. And I am only one of millions so far around the world whose homes and/or workplaces have been destroyed by the increased intensity of storms-hurricanes, flooding, tornados, icestorms. It is an insult to the people of Breezy Point and Rockaway who lost so much to put this pipeline right across our peninsula.

My second disaster-on the July 4 weekend this year, a large tree in my back yard in Dobbs Ferry, Westchester, was twisted in a sudden "freak" microburst and dropped on my house. Since then I've been involved with the building department, inspectors, engineers and contractors and work has still not started to repair my kitchen and dining room and the structural damage and four large holes in my roof. We never used to have storms like this.

It's easy to continue putting greenhouse gases into the air, it's not easy to repair the damage they cause to the lives and property of real people, like me.

As the Federal Energy Regulatory Agency, your first job should be to regulate out of existence the energy sources that are killing us. It's time to start healing the earth.

IND176-1

Comment noted.

IND177 – Barbara Pearson

20131209-5238 FERC PDF (Unofficial) 12/9/2013 3:35:14 PM

The following comments relate to the siting of the M&R station

IND177-1 **Alternatives 1 and 2 state that avoiding temporary construction impacts on users of the community garden at Floyd Bennett Field is the primary advantage of the site.**

Users of the community garden who are even aware of and actively objecting to the placement of the M&R station in the hangars see these temporary construction impacts as the least significant adverse effects of siting the M&R station, as should the FERC and Transco, thereby nullifying the "primary advantage" statement made in the draft EIS for these alternatives.

IND177-1 Comment noted.

IND177-2 **A major drawback of Alternative Sites 1 and 2 is that it would require the development of new industrial buildings within the GNRA.**

Any introduction of an industrial use into GNRA is a significant adverse effect of all possible sitings of the M&R on national park land, including the preferred siting of the M&R in the hangars. The discussion of the environmental impact on Floyd Bennett Field in Section 4.8.7 conveniently does not contain the word "industrial" at all. So it seems Transco and FERC would have us believe that the M&R has an industrial impact on alternative sites but not on the preferred site in the hangars. That defies all logic.

IND177-2 Comment noted.

IND177-3 **Alternative sites 1 and 2 – "these buildings would be visible from Flatbush Avenue"**

How anyone can consider this of any significance after driving down Flatbush Avenue is laughable. Let's see, any ugly place made slightly uglier vs. an alienation of national park land that sets a precedent for industrial use in all national parks. Hmmm....which of those impacts should the ROD weigh at, say, 100 and which should be weighted at less than 10? Plus, any negative visual impact of these buildings is easily solved by landscaping. Has anyone looked at the south side of the Aviator buildings? Nobody seems bothered by the effect this horrendous mess has on what people driving along Flatbush Avenue see. How about those beautiful parking lots we don't want to disturb at sites 3 and 4? I think the one at alternative site 3 is particularly lovely.

IND177-3 See Section 3.5 of the EIS.

IND177 – Barbara Pearson (cont'd)

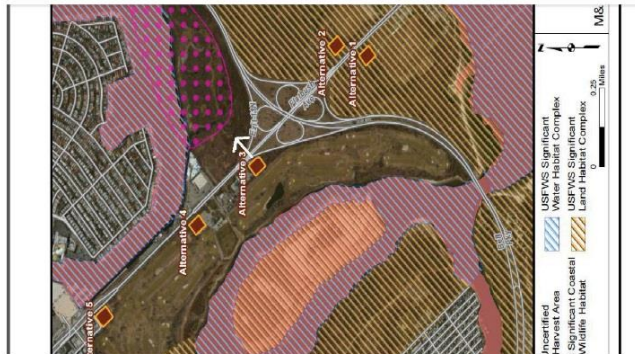
20131209-5238 FERC PDF (Unofficial) 12/9/2013 3:35:14 PM

ND177-4 Roughly hal of Alternative Site 3 is forest land, which would have to be cleared, resulting in the permanent loss of woodlands. Additionally, although the alternative location is not located within and would not likely be visible from the GNRA, it would still be clearly visible to users of the Marine Park Golf Course and from vehicles using Flatbush Avenue.

"Forest" is a convenient choice of word with a connotation of importance that does not in fact exist. Again, visibility of the facility from these perspectives is an impact so easily mitigated that it is not even worth discussion.

IND177-5 Why is there no discussion of using the land directly across Flatbush Avenue from Alternative Site 3 for the M&R? According to the public land and tidal wetlands maps in the draft EIS, it is neither on GNRA or municipal park land nor is it in a defined area of coastal significance.

This is one of the least objectionable sites for the M&R in virtually every way yet it is not even considered. It seems that all alternatives are selected deliberately to be able to present objectionable aspects in comparison to the preferred site.



IND177-4 Comment noted.

IND177-5 As discussed in Section 3.0 of the EIS, not all conceivable alternatives are technically and economically practicable and feasible. Some alternatives may be impracticable or infeasible because they are unavailable for use or are incapable of being implemented. We did not evaluate the area on the east side of Flatbush Avenue just north of the Belt Parkway Interchange as an alternative site for the M&R facility because the land was not available for purchase or lease to Transco by its owner, a factor we consider in our evaluation of alternative sites for aboveground facilities. Additionally, there are several factors that would limit development of the site as an M&R facility, including the amount of available space and ongoing erosion of the site between Mill Basin and Flatbush Avenue.

IND177 – Barbara Pearson (cont'd)

20131209-5238 FERC PDF (Unofficial) 12/9/2013 3:35:14 PM

IND177-6 **While use of Alternative Site 3 would avoid impacts on gardeners in the community garden at Floyd Bennett Field (the site is located about 6,065 feet to the northeast of the garden), it would affect existing land uses at Marine Park. The alternative site is in an area used for park vehicles and equipment. Construction of an M&R facility at this location would require the relocation of park vehicles and equipment to another area, which could lead to secondary impacts on land uses or on vegetation. Additionally, as city property, the use of Alternative Site 3 would require alienation of parkland through the state legislature for a new M&R facility to be built. This would be particularly challenging for Alternative Site 3 because the NYCDPR deemed this alternative the least appealing due to land use conflicts and concerns about the amount of useable space, as portions of the site have been ceded to the New York City Department of Transportation (NYCDOT).**

- Relocation of park vehicles and equipment is as bogus an argument as could possibly be made when assessing environmental impact.
- Why is alienation of park land only a problem for city park land, not national park land?
- NYCDPR finds the alternative the least appealing – the purpose of this project is to enhance the natural gas supply of New York City. If any agency or entity should suffer the consequences of this project's least appealing consequences, it is a New York City one, not a federal one.

IND177-6 Comment noted.

IND177-7 **M&R Facility Alternative Site 4, like Alternative Site 3, is located on NYCDPR-owned property on the Marine Park Golf Course west of Flatbush Avenue. The site is in a vacant parking lot adjacent to the main parking area of the golf course. . . . It would have greater direct and indirect impacts on Marine Park because it would occupy a portion of the golf course parking lot. . . . Additionally, a portion of the existing parking lot would be permanently lost and converted to nonrecreational industrial use, and the construction of new buildings could disrupt existing viewsheds from the golf course or other areas of the park.. . . In addition, as city property, the use of Alternative Site 5 [sic] would require alienation of parkland through the state legislature for a new M&R facility to be built.**

- Since when is the impact on a parking lot of any significance at all?
- So, the parking lot being converted to non-recreational industrial use is actually a true distinction from its current use?
- Why is alienation of park land only a problem for the alternative

IND177-7 Comment noted.

IND177 – Barbara Pearson (cont'd)

20131209-5238 FERC PDF (Unofficial) 12/9/2013 3:35:14 PM

IND177-7
(cont'd)

sites?

- All talk of disruption of viewsheds is bogus. Not only can most be mitigated with new landscaping, but these assessments give the false impression that these are viewsheds that are not already seriously compromised and could, with the M&R's attendant mitigative landscaping, actually be improved.

IND177-8

Alternative Site 5 is located on city property farther from the GNRA than any other site. . .

Construction of new M&R facility buildings within Marine Park would have a long term visual impact on golfers and other visitors to the golf course. Development of the site would result in the removal of about 0.2 acre of trees that screen the property from the surrounding area. The removal of these trees would change the visual character of the Marine Park Golf Course, King's Plaza, and Flatbush Avenue. . . . In addition, as city property, the use of Alternative Site 5 would require alienation of parkland through the state legislature for a new M&R facility to be built.

- Really, how tall would a newly-built M&R building be? This draft EIS makes it sound like it's going to be a skyscraper to rival the Manhattan skyline that wouldn't easily be blocked from view if one actually bothered to try.
- How insurmountable is replacement of 0.2 acres of trees for screening?
- And again, alienation of park land is only a problem for alternative sites.

IND177-8

Comment noted.

IND178 – Carol and Michael McKenna

20131209-5272(28969573).txt

IND178-1 Carol and Michael McKenna, Rockaway Park, NY.
Please do not go ahead with this pipeline. As you know, it is dangerous and
unnneeded. At a time when government and private industry are striving to create
safe and sustainable methods of producing and delivery energy, fracking and the
pipeline are completely contrary to this goal. What misguided thinking could have
led you to approve said construction? It is imperative that this construction be
stopped immediately. Please let yourself be guided by common sense and the desire
to keep your residents safe and healthy for years to come. It would be a crime to
destroy our ecosystem and put us all in danger of explosions and emissions that you
already know would be deadly. Thank you.

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IND178-1

Your opposition to the Rockaway Project is noted. Construction of the
Rockaway Project has not been approved.

IND179 – Ida Sanoff

20131209-5271(28969571).txt

Ida Sanoff, Staten Island, NY.
Natural Resources Protective Association
P.O. Box 050328
Staten Island, NY 10305

December 9, 2013

Federal Energy Regulatory Commission
Office of Energy Projects
Washington, DC 20426

RE: Rockaway Delivery Lateral Project
FERC/EIS-0246D
Docket No. CP13-36-000

To Whom It May Concern:

The Natural Resources Protective Association is a citywide, all volunteer membership association. We focus on preservation and protection of marine and shoreline habitat and open space issues. Many of our members are involved in recreational and commercial fishing activities and some live in the immediate vicinity of the project area.

- IND179-1 1) The Work Description includes aboveground facilities that would be constructed in the historic airplane hanger complex at Floyd Bennet Field. This runs contrary to what has been proposed and promised for Floyd Bennet Field. In September, 2010, there were Public Meetings, convened by a Blue Ribbon Panel, about the future of Floyd Bennet Field. Attendees were adamant that only environmental, educational and recreational uses should be permitted at Floyd Bennet Field. Permitting new industrial uses at this complex, disguised inside of historical buildings, runs contrary to the entire process of soliciting public input. Furthermore, there are significant concerns about the safety of such facilities.
- IND179-2 2) The project will have significant short term, long term and potentially permanent impacts on marine habitat. Installing the pipeline will require disruption of a 2.15 mile length of sea bottom with a post lay jet sled. According to the FERC DEIS, construction of the HDD pit would directly impact 38 acres of seabed with an additional 402 acres impacted by sedimentation. This would bury benthic communities and also result in dispersal of any contaminated sediments in the area, increasing bioaccumulation. The pit itself would contain drilling fluids of unidentified, proprietary composition, including substances that may be toxic to marine life. It would then be capped with presumably clean sediments. But if the cap is displaced, the fluids will disperse into the surrounding habitat and there is evidence that this may occur. In the Nor'Easter of 1992, the Historic Area Remediation Site (HARS) lost over 200,000 cubic yards of cap material. Hurricane Sandy directly impacted the proposed HDD project area and caused significant movement of bottom sediments and debris. Furthermore, the construction of a new pit within the New York Bight for the disposal of possibly contaminated sediments, near a public beach and environmentally sensitive areas is a very poor decision.
- IND179-3 3) The sea bottom will be disturbed by the jetting process and it will take several years for successional communities of species resembling the pre-trenching population to become established. However, the pipeline will require periodic maintenance every seven years, so by the time populations are re-established, they will be disturbed again. This will result in long term, perhaps permanent damage to marine biota and local fisheries.
- IND179-4 4) Backfilling of the trench will require the use of a suction dredge, which would further disrupt bottom communities and increase sediment suspension. The cumulative impacts would extend over several miles.

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- IND179-1 Your opposition to use of the hangars for the proposed M&R facility is noted. See the response to comment CM1-34.
- IND179-2 Comment noted. Impacts on the marine environment due to offshore trenching and the HDD operation are discussed in Sections 4.3, 4.5, 4.6, and 4.7 of the EIS. See the response to comment CM1-85 regarding the potential for resuspension of contaminated sediments in the water column.
- IND179-3 See the response to comment CM2-24.
- IND179-4 Comment noted.

IND179 – Ida Sanoff (cont'd)

20131209-5271(28969571).txt
IND179-5 5) Large pods of marine mammals, especially dolphins, have recently been observed in and near the project area. We are concerned about long term impacts to them.
IND179-6 6) Measures to control accidental spills from construction vessels should be presented to the public for comment.
IND179-7 7) Many of the fire hydrants at Floyd Bennet Field are inoperable. An accident at the metering station could be catastrophic. Why haven't evacuation plans been made public?
IND179-8 8) Given the flooding that covered much of Brooklyn after Hurricane Sandy, the rationale for constructing a metering station in this location has not been justified.

Thank you for considering our comments.

Sincerely,
Ida Sanoff
Executive Director

Page 2

IND179-5 Comment noted. Impacts on marine mammals are discussed in Section 4.5.2.2 of the EIS.

IND179-6 Comment noted.

IND179-7 Comment noted. See the response to comment CM2-27. Pipeline safety is discussed in Section 4.12 of the EIS. Evacuation plans are not required for the Projects.

IND179-8 Comment noted. See the response to comment CM1-8.

IND180 – Moira Meltzer-Cohen

20131209-5273(28969575).txt

IND180-1 Moira Meltzer-Cohen, Brooklyn, NY.
Fracking is incredibly devastating to the environment and you should not do it. Short term gains for a few are absolutely immoral in the face of permanent consequences for the rest of the world. Everything from the diminished quality of water to the increased rates of sexually transmitted infection (large itinerant male workforce, see food and water watch study) causes the environment and the people and animals in it to suffer. You have an ethical, if not a legal duty to listen to the people impacted by fracking, and not the corporations that benefit therefrom. I enjoin you to take that responsibility seriously, or have fun being blamed for all the litigation fees and CERCLA costs that will follow, to say nothing of irretrievably damaged ecosystems. It is inconceivable to me that the members of FERC could live with themselves after putting the "needs" of corporate economies over the literal survival of the planet and its human and non-human inhabitants. You have an opportunity to do the right thing, for our grandchildren as well as your own.

Page 1

IND180-1

Your opposition to the Rockaway Project is noted. See the response to comment CM1-6.

IND181 – C.J. Holm

20131209-5276(28969578).txt

IND181-1 CJ Holm, Brooklyn, NY.
The Gateway National Recreation Area is a gem, and shouldn't be thrown away lightly. Fracked natural gas is not a necessary component of our energy future in New York City. The Rockaway Peninsula was devastated by Hurricane Sandy, a climate-change-worsened "superstorm" that shows us a glimpse of what the future will look like because of our addiction to burning fossil fuels. To risk the health of the Rockaways in order to pipe more fossil fuels into Brooklyn is the height of irony and would be a serious mistake.

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IND181-1 Your opposition to the Rockaway Project is noted.

IND182 – Meredith Dillon

20131209-5278(28969581).txt

Meredith Dillon, New York, NY.

IND182-1 Perhaps the most common rationale for the use of natural gas is that it is a "transition fuel" to a clean energy future. Advocates point to the decrease in carbon in the US: natural gas as a replacement for coal adds less carbon to the atmosphere. This sounds wonderful but it's only part of the story.

I also realize that while we have the technology to convert to clean renewable energy now, the transition is not so simple because of the need to update grids, deal with the complicated issue of distributed energy, etc. Conventional wisdom tells us that transitioning to clean energy is not something that can be done immediately.

However, there are things that are being left out of the conversation.

IND182-2 1. The Brooklyn Queens internet will enable more residents to convert to natural gas. why is this necessary when there is a glut of natural gas? why do we continue to spend billions on gas infrastructure instead of using existing pipelines to move what gas we have and put our investments immediately into energy efficiency measures, and developing wind, solar and other renewable sources of energy?

IND182-3 2. We are in a time of greatly decreased government resources so have few regulators to monitor existing aging pipelines. Pipelines are risky especially in high density areas. And Williams Transco, the company who is in line to build this pipeline, was denied a permit by the Hazardous Material and Safety Administration in 2010 due to its a "significant history of noncompliance issues."

IND182-4 3. Gas from the Marcellus Shale has much higher radon levels than the gas that is currently coming to the NY Metropolitan area from the Gulf Coast. The Rockaway pipeline will be a path for increased radon coming into homes. (Howarth et al.) It is also not news that radon is the largest cause of lung cancer after smoking. While the effect of this will not be seen for years, it is irresponsible to be exposing millions of NY'ers to the risk of lung cancer down the road. It will also have a devastating effect on increased health care costs when this occurs.

IND182-5 4. The NY Bight where part of this pipeline will be built is currently a source of great ecological diversity and a source of commercial activity as well. According to the National Atmospheric and Oceanographic Administration (NOAA) the economic value of fisheries in this area was \$10.9 million in 2010. The turbidity, noise levels and disruption related to construction of the pipeline will undoubtedly disrupt marine life and the commercial activity it supports.

IND182-6 5. Williams Transco has applied to NOAA for an exemption to the 1972 Marine Mammals Act which protects the incredible array of wildlife living off our shores: right whales, harp and harbor seals, harbor porpoises, among others. why do our energy needs give us the right to destroy these amazing creatures, potentially forcing their extinction?

IND182-7 6. And in the rush to build out infrastructure for natural gas, the conversation about climate change has been forgotten at the highest levels. Yes, natural gas has less carbon than coal but it releases methane through its many processes related to extraction and delivery. And methane is 30 times more potent than carbon as a heat trapping gas.

Please deny this permit and become a leader toward a sane energy future!

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IND182-1 Comment noted.

IND182-2 Comment noted. The purpose and need for the Projects are discussed in Section 1.1 of the EIS. Energy conservation and renewable energy alternatives are discussed in Sections 3.1.1 and 3.2.2 of the EIS.

IND182-3 Comment noted. See the responses to comments CM1-31 and CO11-19. Pipeline safety, including Transco's incident history, is discussed in Section 4.12 of the EIS.

IND182-4 See the response to comment CM1-21.

IND182-5 Comment noted. Impacts on marine wildlife are discussed in Sections 4.5, 4.6, and 4.7 of the EIS. Impacts on fisheries are discussed in Sections 4.8.4 and 4.9.6 of the EIS.

IND182-6 Comment noted. Impacts on marine mammals including Transco's request to NOAA Fisheries for an IHA under the MMPA are discussed in Section 4.5.2.2 of the EIS.

IND182-7 Comment noted. See the response to comment CM1-68.

IND183 – Ann Bassen

20131209-5279(28969582).txt

IND183-1 Anne Bassen, Brooklyn, NY.
The Rockaway Pipeline project by Williams Transco should be halted for the following reasons also.
It's especially ironic that this pipeline full of greenhouse gas would be going straight through Rockaway, an area which has already been devastated by the effects of climate change in the form of superstorm Sandy. The more we learn about energy production, the more we see that sustainable energy sources like wind, tidal, and solar power are the only way we can hope to mitigate the impending climate catastrophe which is expected to have dramatic impacts on our planet and civilization.

Page 1

IND183-1

Your opposition to the Rockaway Project is noted. Renewable energy alternatives are discussed in Section 3.2.2 of the EIS.

IND184 – Barbara Pearson

IND184-1

Cumulative impacts

The FERC DEIS has not assessed the indirect and cumulative impacts of siting the M&R station in a national park. NPS's own NEPA guidelines state that NPS must consider the system-wide ramifications of decisions made at any particular unit. There is no such consideration given to the leasing of the hangars for the M&R station in FERC's DEIS and so NPS cannot possibly accept a final EIS that has not evaluated this cumulative impact.

IND184-1

This issue will be addressed by the NPS in their decision document for the Rockaway Project.

IND185 – John Baldwin

20131209-5283(28969590).txt

IND185-1 John Baldwin, New York, NY.
We face the end of civilization and the possible extinction of human and animal life on earth, possibly within the next hundred years or so, if we continue to use fossil fuels that generate greenhouse gases. Natural gas is being presented as an alternative to "dirty" fossil fuels like oil and coal. But how can that be possible when shale gas, which is what would be transported through this pipeline, is far dirtier even than coal, if the entire extraction-through-use cycle is taken into account? (See this study here: <http://link.springer.com/article/10.1007/s10584-011-0061-5>.)
In addition, according to the International Panel on Climate Change (IPCC), because so much greenhouse gas has already accumulated in the atmosphere, climate change would continue for centuries, even if humanity stopped all greenhouse gas emissions right now! (<http://inhabitat.com/climate-experts-confirm-that-humans-are-to-blame-for-climate-change-in-landmark-ipcc-report/smoke-one>)
This is no time to approve the environmentally destructive practice of fracking. This is the time for changing over to 100 percent renewable energy. The people of the Rockaways have suffered enough from Hurricane Sandy, which was almost certainly exacerbated by climate change. Please don't make them, and the planet, suffer even more with the imposition of this environmentally unsustainable pipeline.

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IND185-1

Comment noted. See the response to comment CM1-68. Renewable energy alternatives are discussed in Section 3.2.2 of the EIS.

IND186 – Eleanor Preiss

20131209-5285(28969595).txt

IND186-1 Eleanor Preiss, Brooklyn, NY.
Williams/Transco has an abysmal safety record. Please see part of the long list below. I am wondering if the facilities involved were approved by FERC? If so, I would think even if you don't have a legal responsibility for these accidents, you would certainly have an ethical one.

6/2013 Geismar, LA Explosion at facility processing natural gas liquids. Upon investigation, it was learned that the facility had operated for three years in direct violation of the Clean Air Act and had had no OSHA inspections in a decade. Two deaths, 70 injured.

5/2013 near Montrose, PA Compressor station caught fire.

5/2013 Branchberg, NJ Explosion at compressor station. 13 injured

3/2013 Cameron, WV 24" pipeline ruptured, methane leaked

Please don't add the Rockaways to this list. Disapprove the Rockaway Lateral Pipeline

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IND186-1

Your opposition to the Rockaway Project is noted. Pipeline safety, including data on pipeline accidents and incidents on Transco's system, is discussed in Section 4.12 of the EIS.

IND187 – Maureen Healy

20131209-5294(28969613).txt

Maureen Healy, Brooklyn, NY.
Dear Federal Energy Regulatory Commissioners,

IND187-1 | This is what I want you to know about last summer in Rockaway:
| http://www.huffingtonpost.com/2013/09/25/whale-rockaways-video-surfer-photos_n_3987795.html

IND187-1

Comment noted.

Page 1

IND188 – Rebekkah Thompson

20131209-5293(28969612).txt

IND188-1 Rebekkah Thompson, Rockaway Beach, NY.
As a Rockaway Resident raising children in the Rockaway community, I am concerned with the detrimental health and environmental impacts with the passing of this project. I am poor you to explore other Alternative methods of reusable energy. Rockaway is the prime location for the use of reusable energy. Make greater efforts to engage the community in discussions on how residents can have a say and part in protecting the Rockaways. Our community needs improvement not increased dangers of unhealthy harmful chemicals. There are solutions to this problem. It does not have to be the pipeline. Let's make the right decision for the long term. Please engage the community on the prospects of reusable energy methods. we must explore alternatives that protected the environment, protect our home and the culture and social life of our community.

Page 1

IND188-1

Comment noted. Renewable energy alternatives are discussed in Section 3.2.2 of the EIS. The FERC does not regulate proposals for renewable energy projects.

IND189 – Ellen Osuna

20131210-5000(28969617).txt

- IND189-1 Ellen Osuna, Glen Oaks, NY.
I write in strong opposition to the Rockaway Lateral Delivery Project. I'm sure you have received many comments noting the tragic irony of a project which would further accelerate climate change placed in a location which has already shown itself extremely vulnerable to climate change caused storms.
- Although gas burns cleaner at the end of its life cycle, the full circle process of extracting fracked gas (as well as emissions from the pipeline itself and its metering and regulating station), adds unacceptable levels of methane into the atmosphere, a potent greenhouse gas.
- IND189-2 FERC, as the regulating agency, *DOES HAVE THE RESPONSIBILITY* of considering all of this pipeline's effects. The fact that it will encourage more fracking of gas, more pollution of water, air, and climate, on the areas the gas is coming from, and the climate we all share - *IS WITHIN THE RESPONSIBILITY OF FERC TO GIVE WEIGHT TO*.
- There are also the immediate impacts for people, plants, and animals, (in an area near a community garden, and National Wildlife Refuge). Impacts from methane leakage, and risk of explosion - which is significant given that it is in an extremely hurricane vulnerable area.
- IND189-3 What we should be going as a society, led by agencies like FERC, is choosing truly renewable energy. You've heard of the blueprint by Mark Jacobsen and other energy researchers for NY State to go 100% renewable. It is possible.
- Please reject this pipeline, and help us move forward with renewables.

Page 1

IND189-1 Comment noted. See the response to comment CM1-68.

IND189-2 See the response to comment CM1-6. Impacts on the natural environment are discussed throughout the EIS. Pipeline safety is discussed in Section 4.12 of the EIS.

IND189-3 Renewable energy alternatives and the referenced study by Jacobson et al. (2013) are discussed in Section 3.2.2 of the EIS.

IND190 – Tony Santiago

20131209-5295(28969616).txt

IND190-1 Tony Santiago, Bronx, NY.
This is a pipeline that is a danger to our fish and wildlife. These pipeline have a history of explosions. There are other alternatives to high risk energy. This project must not be allowed!

Page 1

IND190-1

Your opposition to the Rockaway Project is noted. Impacts on wildlife, including fish, are discussed in Sections 4.5 through 4.7 of the EIS. Pipeline safety is discussed in Section 4.12 of the EIS.

IND191 – Edith Kantrowitz

20131209-5032(28967288).txt

Edith Kantrowitz, Brooklyn, NY.
Human beings have been very concerned about how this pipeline will affect us in terms of safety, environmental degradation, health effects, radon exposure, climate change, and many other issues. But what about all the other living beings that will be impacted by this project and are not able to speak up for themselves or write comment letters? Williams Transco has applied to the National Marine Fisheries Service for "Incidental Harassment Authorization" for seven marine mammals, including the gray seals, harbor seals, harp seals, the North Atlantic right whale, bottlenose dolphins, harbor porpoises, and short-beaked common dolphins. Why should this be necessary?

A number of endangered and protected species may be affected, as well. Williams Transco has acknowledged that the project "is likely to adversely affect" the Atlantic sturgeon, and "may affect" the North Atlantic right whale, leatherback sea turtle, Kemp's ridley sea turtle, green sea turtle, and loggerhead sea turtle. One of the most serious possible impacts is exposure to underwater noise resulting from pile driving in the construction process. But the dEIS also mentions a host of other concerns, including possible injuries from collisions with construction vessels or equipment, possible loss of feeding habitat as fish populations and organisms that dwell on the ocean bottom are disturbed, exposure to floating debris, exposure to toxic sediments, etc. (The dEIS states that 38 acres of seabed will be directly impacted by construction, and another 402 acres will be affected by sediment stirred up in the construction process. Some of this sediment is likely to include unidentified or proprietary substances that are toxic to marine life.)

IND191-2 The Atlantic sturgeon is far from the only fish that may be affected. In fact, within the project construction area, Essential Fish Habitat has been identified for 39 fish species, including flounder, monkfish, bluefish, black sea bass, and the Atlantic, Spanish and king mackerel. Williams Transco states that, "Overall, impacts on managed species identified as having EFH in the Project area will vary depending on the species." In addition to the noise effects mentioned above, these impacts may include increased water turbidity from construction operations, direct loss of eggs and larvae during construction trenching operations, and reduction in available forage due to reduction of benthic (bottom dwelling) community densities.

IND191-3 While Williams Transco states that benthic communities will re-establish over a short period of time, the timeline for this to happen is not at all certain. It will likely take several years for pre-construction levels to be established, and since maintenance will disrupt the trenched area again every seven years, the cumulative impacts may result in permanent ecosystem damage. Transco Williams has also acknowledged that their new plans to perform construction during the spring and summer, rather than during the winter as originally intended, may have a greater impact on benthic organisms.

IND191-4 And what about birds? Well, there are plenty of them in the project construction area, as well as Jamaica Bay and Floyd Bennett Field, including protected species like the roseate tern, and the piping plover. Williams Transco does not expect birds to suffer any impacts directly related to construction. But do we really think negative environmental impacts will completely cease after the construction phase? We know that shale gas pipelines continually leak methane. How will that affect the birds and the surrounding ecosystem?

IND191-5 Williams Transco has proposed a variety of "mitigation" measures aimed at reducing or limiting the environmental impacts of the pipeline's construction, such as keeping a watch out for whales and sea turtles and holding off on construction operations when they are sighted. But do we really know how effective these measures will be? In many instances, Williams Transco asserts that possible negative impacts will be "minimal," they will be temporary, or they will only affect "individuals," not "populations." Does that mean it's acceptable if only a few sea turtles or dolphins are injured by construction equipment? And for a project that shouldn't be happening in the first place? We really don't need methane gas for our energy

IND191-6

IND191-1

Comment noted. Impacts on marine wildlife are discussed in Sections 4.5, 4.6, and 4.7 of the EIS. Impacts on marine mammals, including Transco's request to NOAA Fisheries for an IHA under the MMPA, are discussed in Section 4.5.2.2 of the EIS. Impacts on threatened and endangered species are discussed in Section 4.7 of the EIS.

IND191-2

Comment noted. Impacts on EFH are discussed in Sections 4.6.3 through 4.6.6 of the EIS.

IND191-3

Comment noted. Impacts on benthic species are discussed in Sections 4.5.2.1, 4.5.3.2, 4.6.3.2, 4.8.4.1, and 4.9.6 of the EIS. See the responses to comments CM1-14 and CM2-24.

IND191-4

Comment noted. Impacts on birds are discussed in Sections 4.5.2.3, 4.5.2.4, 4.5.3, 4.7.1.5, and 4.7.5 of the EIS.

IND191-5

See the response to comment CO11-33.

IND191-6

Comment noted. See the response to comment CM1-6.

IND191 – Edith Kantrowitz (cont'd)

20131209-5032(28967288).txt
IND191-6 future. It will only encourage fracking and climate change, and we should be going
(cont'd) as quickly as possible to renewables instead.

Page 2

IND192 – Genevieve Hitchings

20131210-5002(28969698).txt

IND192-1 | Genevieve Hitchings, New York, NY.
As a New York City resident I strongly urge the FERC, NOT to approve the Rockaway Pipeline. We entrust our government to ensure that public land be protected and managed in the best interest of its people. The Rockaway Pipeline puts the land in danger of serious, irreparable environmental damage. The FERC will hopefully have enough foresight to recognize this and therefor NOT approve the Rockaway Pipeline.

Sincerely,
Genevieve Hitchings

IND192-1 Your opposition to the Rockaway Project is noted.

Page 1

IND193 – Anne Gatschet

20131210-5003(28969699).txt

IND193-1 Anne Gatschet, Sleepy Hollow, NY.
I am a high school teacher and mother of two. This pipeline not only represents environmental degradation unacceptable to New York citizens, it also threatens to move New York in the opposite direction from the realistic, sustainable future it must build now in order to survive. As the Rockaways themselves have proven in the aftermath of hurricane Sandy, this region is vulnerable to the environmental changes brought on by climate change. We must be directed toward energy systems that do not exacerbate climate change, and natural gas is a dirty polluter of the atmosphere. The pipeline promises disruption and even destruction to many fragile ecosystems and to great work and financial investments in renewable energies and sustainable urban development. For New York's deep commitment to industrial progress, beauty of the natural and built environment, and to community values, this project is an insult.

Page 1

IND193-1

Your opposition to the Rockaway Project is noted. Renewable energy alternatives are discussed in Section 3.2.2 of the EIS.

IND194 – Sandra Stratton Gonzalez

FILING IN RESPONSE TO DRAFT EIS

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December 8, 2013

Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426
Attention: Ms. Kimberly D. Bose, Secretary

Transcontinental Gas Pipe Line Company, LLC Rockaway Delivery Lateral Project
FERC Docket: CP13-36-000

Dear Secretary Bose:

I am an intervenor opposing the Rockaway Lateral Project. I am submitting comments with regard to the draft EIS and its unaddressed safety issues; Hurricanes and Flooding, Leaks and Explosions, Transco Williams Safety Record, Lack of Oversight, and Evacuation.

Hurricanes and Flooding

The Draft Environmental Impact Statement (dEIS) Section 4.1.4.2 (on Hurricanes) states:

"An analysis by the New York State Emergency Management Office (2005) found that the entire Rockaway Peninsula and much of the Brooklyn-Queens area could be flooded due to Category 3, 4 or 5 hurricanes depending on the direction of prevailing winds at landfall, distance from the eye of the storm, eye wall intensity, and tide level, but the risk of flooding during a major hurricane event is difficult to predict. The Intergovernmental Panel on Climate Change considers it likely that hurricanes will become more intense as a result of climate change and sea level rise, but the total number of storms could decline (P'achauri and Renninger, 2007)."

IND194-1 During Superstorm Sandy, the water surged to a height of 14 feet. The M&R station is at an elevation of 16 feet, and the equipment is to be raised above floor level by one foot. Given the prediction that hurricanes will increase in intensity, it seems entirely plausible that the next great storm will have floodwaters of at least the 17 feet above sea level. Water immersion creates the risk of leaking and explosion, please read below.

IND194-1 See the response to comment CM1-8.

IND194 – Sandra Stratton Gonzalez (cont'd)

Leaks and Explosion

The pressure entering that M&R facility will be up to 960 pounds per square inch. The regulator's job is to lower that pressure. According to the president of the New England Gas Workers Association:

IND194-2 *"Water can cause the regulator to be stuck open completely, in the wide open position ... If that happens, it dramatically increases the pressure and it can cause serious problems down the line. If gas is coming into a home or a business at a much higher pressure than it's supposed to, it can cause a fire or even an explosion. In addition, prolonged exposure to water can contribute to accelerated corrosion of the regulators, causing gas leaks that could trigger an explosion or fire."*

IND194-3 If there is a major fire, NYC is ill prepared to fight one. Firemen tell us that in Floyd Bennett Field, many of the hydrants don't work and others have insufficient water pressure to respond to a fire. The National Parks Service, which oversees Floyd Bennett Field and Gateway National Recreation Area, admitted that the broken hydrants have not been repaired since the New York Post reported about their condition last year. "In terms of the fire hydrants, nothing has changed," said National Parks Service spokesman John Warren.

Floyd Bennett Field Hydrants Don't Work, Critics Say
Residents blast Floyd Bennett Field pipeline plan, by Colin Mixson
http://www.brooklyndaily.com/stories/2012/32/mm_floydbennettpumps_2012_08_10_bk.html

Transco Williams Safety Record

IND194-4 Safety concerns are particularly troubling given Transco Williams spotty safety record. There have been 35 reportable safety incidents for Transco Williams since 2006, including:

- Appomattox, VA, September 2008 – pipeline fails, blowing a fireball that scorched an area 1,125 feet in diameter, leveling two homes and injuring 5 people and damaging 100 homes.
- Alabama, 2011 – pipeline ruptures, shooting flames 100 feet into the air for 90 minutes after the pipeline was shut off; the explosion is heard more than 30 miles away.
- Springfield Township, PA, March 2012 – explosion blows hole in roof of compressor station, shakes homes a half mile away.
- Ellicott City, MD, July 2013 – Natural gas pipeline explodes, witnesses describe the sound as that of a jet plane landing on the roof. Fortunately nobody was injured.

The Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a *Corrective Action Order* to Williams Partners on Dec. 6, 2011, in connection with the massive natural gas explosion that occurred in Marengo County, Alabama, on Dec. 3, 2011, on the company's Transco pipeline.

"On December 3, 2011, one of the five parallel natural gas pipelines in Transco ruptured in Marengo County, Alabama. The force of the rupture created a large crater and propelled a 47- foot, 3-inch piece of buried pipe more than 200 feet away. The releasing gas also ignited and continued to burn for several hours, causing damage to one of the adjoining pipelines and scorching approximately eight acres of surrounding property.

IND194-2 See the response to comment CM1-50.

IND194-3 See the response to comment CM2-27.

IND194-4 Comment noted. Pipeline safety, including Transco's incident history, are discussed in Section 4.12 of the EIS.

IND194 – Sandra Stratton Gonzalez (cont'd)

IND194-4
(cont'd)

After in investigation of the incident PHMSA noted that Williams, “*has not determined whether the conditions that caused the failure exist on other portions of Transco,*” and determined that if Transco continued to operate the pipeline it would likely result in “*serious harm to life, property, and the environment.*”

Owner of P.A Natural Gas Facility that Exploded Has Lengthy Record of Pipeline Safety Violations: Natural Gas Watch <http://www.naturalgaswatch.org/?p=1305>
Mar 30th, 2012 | By [figallagher](#)

In addition, other Williams companies have been cited by PHMSA for natural gas safety violations, including:

- June 24, 2011 – Williams Partners subsidiary, the Transcontinental Gas Pipeline Co. LLC, was fined \$23,800 by PHMSA for failure to conduct annual inspections of natural gas compressor stations in Texas and Louisiana.
- March 5, 2012 – Williams Partners subsidiary, the Transcontinental Gas Pipeline Co. LLC fined \$50,000 by PHMSA for failure to follow its own, internal policies related to controlling external corrosion in natural gas pipelines running through the New York City borough of Staten Island.

IND194-5

Lack Of Safety Oversight

Given the spotty safety record of Williams Transco, it is even more disturbing that the little-known federal agency charged with monitoring the system and enforcing safety measures — the Pipeline and Hazardous Materials Safety Administration — “is chronically short of inspectors and lacks the resources needed to hire more, leaving much of the regulatory control in the hands of pipeline operators themselves, according to federal reports, an examination of agency data and interviews with safety experts.”

Pipeline Spills Put Safeguards Under Scrutiny
http://www.nytimes.com/2011/09/10/business/energy-environment/agency-struggles-to-safeguard-pipeline-system.html?_r=3&pagewanted=all
by Dan Frosch And Janet Roberts, NYT 9/9/11

IND194-6

Evacuating The Barrier Peninsula

Finally, Flatbush Avenue is immediately adjacent to the proposed M&R station. Flatbush Avenue is one of only 3 evacuation points for the population of Rockaway Peninsula, with a population of over 130,000 people. The placement of this M&R Station puts the entire population of the Peninsula at risk.

IND194-7

Safety must be FERC’s primary concern. Due to the issues raised above: potential damage due to flood waters, risk of explosions and leaks, and the dismal safety record of Transco Williams, I respectfully request that the FERC find the Rockaway Lateral Pipeline Project unacceptable.

Very Sincerely Yours,

Sandra Stratton Gonzalez

IND194-5

See the responses to comments CM1-31 and CO11-19.

IND194-6

Comment noted. Pipeline safety is discussed in Section 4.12 of the EIS.

IND194-7

Your opposition to the Rockaway Project is noted.

IND195 – Sandra Stratton Gonzalez

20131209-5071 FERC PDF (Unofficial) 12/7/2013 5:29:07 PM

COMMENTS IN RESPONSE TO DRAFT EIS

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December 6, 2013

Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426
Attention: Ms. Kimberly D. Bose, Secretary

Transcontinental Gas Pipe Line Company, LLC Rockaway Delivery Lateral Project
FERC Docket: CP 13-36-000

Dear Secretary Bose:

IND195-1 I am an intervenor opposing the Rockaway Lateral Project. I am submitting comments with regard to the draft EIS and the use of historic structures in Floyd Bennett Field for a Metering and Regulation (M&R) facility. The uses outlined in the Draft EIS will diminish the historic value of the site, damage historic structures, and constitute an inappropriate use of Gateway National Park.

The Metering and Regulation (M&R) facility would be constructed within a 1.1-acre historic hangar complex (i.e., Hangars 1 and 2). Approximately 5.5 acres would be directly affected by construction of the M&R facility (draft EIS page 4-111). These hangars are part of the historic Hangar Row. Of this historic district the National Parks Service (NPS) states: "The first and most important buildings to be erected at the field were the complex of four pairs of hangars built between 1929 and 1931." <http://www.cr.nps.gov/nr/travel/aviation/flo.htm>

IND195-2 During construction and after project completion, and for the duration of Transcontinental's use of Hangars 1 and 2, the interior of the hangars, and a perimeter around the hangars will be off limits to the public.

IND195-3 Historic Value of Floyd Bennett Field and Hangar Row
The historic nature of these hangars is profound, and speaks to both the role of Floyd Bennett Field in aviation history and to the history of the United States. Here are some of the reasons that the hangars, and Floyd Bennett Field, are so important:

- Floyd Bennett Field was the first municipal airport in New York City.
- During World War II it was the busiest Naval Air Station in the United States, and responsible for decreasing the processing time for aircraft from 10 days to 3 days.

IND195-1 Your opposition to the use of the hangars for the M&R facility is noted. Transco's proposal to rehabilitate the hangar complex is described in Section 4.10.1 of the EIS. See the response to comment CM1-34.

IND195-2 Comment noted. The public does not currently have access to the hangars because the structures are in deteriorated condition. Transco has not proposed an exclusionary perimeter around the hangars.

IND195-3 Comment noted. Transco is proposing a rehabilitated exterior appearance that would restore the hangars' appearance and enhance the visual character of the Floyd Bennett Field Historic District in accordance with a design that would be approved by the NPS, FERC, and the New York SHPO. See the response to comment CM1-34.

IND195 – Sandra Stratton Gonzalez (cont'd)

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IND195-3
(cont'd)

- Because of its unusually long runways and fair weather conditions, Floyd Bennett Field became noted as a prime airport for the experimental fliers establishing speed and distance records.
 - By 1933, Floyd Bennett Field was the second busiest airport in the United States
 - Floyd Bennett Field retains the architectural design and historic integrity of an early municipal airport.
- <http://www.cr.nps.gov/nr/travel/aviation/flo.htm> "Floyd Bennett Field Historic District."

Given the historic nature of these buildings, and the location of the buildings within a National Park, is it at all appropriate to allow for their use by a private, for-profit industry?

Potential Damage to Hangar Row and Historic Structures

IND195-4

According to the Draft EIS submitted by Transco Williams the construction and operation of the Projects may adversely affect these historic properties. Direct effects include possible "destruction or damage to all or a portion of an archaeological site or alteration or removal of a historic property. Indirect effects include the introduction of visual, atmospheric, or audible elements that affect the setting or character of a historic property." (Section 4.10.4, page 4-132, of the Draft EIS)

Vibration damage is one primary concern. In Section 4.11, page 4-130 Transco Williams writes that "the simultaneous operation of multiple pieces of equipment or equipment operating at distances closer than 5 to 10 feet (from the Hangars) could potentially cause damage." The study recommends that the engineering design for the Rockaway Project identify vibration level thresholds for the structures, that Transco prepare and implement a Construction Protection Plan (CPP) to protect the integrity of the hangar complex during construction, and that the plan include vibration monitoring.

Transco further writes that if the FERC, in consultation with the National Parks Service "determines that a historic property would be adversely affected by the Projects and (the damage) could not be avoided, Transco would be required to prepare a treatment plan in consultation with the appropriate parties to mitigate adverse effects."

Transco Williams knows that construction may damage the existing historic hangars. Why does the FERC and NPS seemingly support a project that may cause significant damage to such important historic buildings? Why does the FERC and NPS support a project that will forever remove some of these buildings from the public trust?

Appropriate Use of National Parks

IND195-5

Floyd Bennett Field is an important recreational and educational destination for New York City residents. In December 21, 2010 the Floyd Bennett Field Blue Ribbon Panel's recommendations stated "Floyd Bennett Field (FBF) should be an iconic urban National Park, simultaneously preserving significant natural and cultural resources, serving as a "gateway" to the National Park experience for New York City's residents and visitors of all ages, and helping to address the open space deficit of southern Brooklyn and

IND195-4

Comment noted. Transco's CPP is discussed in Sections 4.10.1 and 4.11.3 of the EIS. See the response to comment IND195-3.

IND195-5

Your opposition to the Rockaway Project, in particular the use of the hangars for the M&R facility, is noted. See the response to comment CM1-34.

IND195 – Sandra Stratton Gonzalez (cont'd)

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IND195-S
(cont'd)

Queens. . . *The historical and habitat assets of FBF should be restored and made accessible. Incompatible uses should be moved out or scaled back.*
(<http://www.rpa.org/floydbennett/FBF-Task-Force-Recommendations.pdf>)

Current activities at Floyd Bennett Field include

- Youth camping
- Nature trails
- A model airplane flying field
- Sports fields used by the Public School Athletic League
- An archery range
- Aviator Sports (just a few hundred feet from Hangers 1 and 2)
- The Floyd Bennett Garden Association of over 400 gardeners (merely 200 feet from Hangers 1 and 2)
- A cricket club
- The Historic Aircraft Restoration Project, and
- The Gateway Environmental Education Center run by the NYC Department of Education and NYU.

Rather than place an industrial project in Floyd Bennett field, the activities described above, particularly those that honor the historic value of the site, should be protected and enhanced. The Rockaway Lateral Project and the M&R station constitute an 'incompatible use' as discussed by the Floyd Bennett Blue Ribbon Panel, above.

Gateway National Recreation Area sees approximately 9.5 million visitors a year. The enabling legislation for Gateway states that:

"In order to preserve and protect for the use and enjoyment of present and future generations an area possessing outstanding natural and recreational features, the Gateway National Recreation Area (hereinafter referred to as the "recreation area") is hereby established. (16 USC Chapter 1, Subchapter LXXXVII - GATEWAY NATIONAL RECREATION AREA)

The use of a National Park for industrial purposes is incompatible with the purpose and intent of the National Parks.

For all of the above reasons; the historic value of Floyd Bennett Field and Hangar Row, the potential damage to Hangar Row and its' historic structures, and the requirement for appropriate use of national parks, Transco should not be allowed to proceed with this project. I especially ask that the metering station and gas pipes not be located within Gateway National Park.

Very truly yours,

Sandra Stratton Gonzalez

IND196 – Sandra Stratton Gonzalez

20131209-5137 FERC PDF (Unofficial) 12/9/2013 12:22:04 PM

FILING IN RESPONSE TO DRAFT EIS

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December 9, 2013

Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426
Attention: Ms. Kimberly D. Bose, Secretary

Transcontinental Gas Pipe Line Company, LLC Rockaway Delivery Lateral Project
FERC Docket: CP13-36-000

Dear Secretary Bose:

IND196-1 I am an intervenor opposing the Rockaway Lateral Project. I am submitting comments with regard to the draft EIS. I believe that this project will result in the delivery of gas to NYC with high concentrations of radon, a major human carcinogen.

Radon Is A Carcinogen Present In Shale Gas

The Rockaway Pipeline, according to Williams Transco's own statements, will bring us gas from the Marcellus Shale, which lies under Pennsylvania, Ohio and New York. This gas is much more radioactive than the gas currently delivered from the Gulf Coast. Studies have shown the potential range of radon concentrations at the wellhead as "between 36.9 picoCuries per liter (pCi/L.) to 2576pCi/L."

(<http://gdacc.org/2012/01/10/radon-in-natural-gas-from-marcellus-shale-by-marvin-resnikoff-radioactive-waste-management-associates/>).

Within the industry the radon levels in Marcellus Shale are used as a marker to distinguish it from gas delivered from other locations. Radon will travel with the gas to New York City kitchen stoves, gas dryers and boilers.

From the EPA:

"You can't see radon. And you can't smell it or taste it. But it may be a problem in your home.

Radon is estimated to cause many thousands of deaths each year. That's because when you breathe air containing radon, you can get lung cancer. In fact, the Surgeon General has warned that radon is the second leading cause of lung cancer

IND196-1

See Section 4.11.1.5 of the EIS and the responses to comments CM1-21 and CO11-23.

IND196 – Sandra Stratton Gonzalez (cont'd)

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IND196-1
(cont'd)

in the United States today. Only smoking causes more lung cancer deaths. If you smoke and your home has high radon levels, your risk of lung cancer is especially high.”

<http://www.epa.gov/radon/pubs/citguide.html>

A Citizen's Guide to Radon
The Guide to Protecting Yourself and Your Family From Radon

IND196-2

New York City kitchens are known for poor ventilation. Building codes prohibit external vents for both stoves and clothes dryers. Many apartments have passive vents, which are actually connected to other apartments via vertical ducts and then released to the roof. Other apartments have no ventilation. In my own apartment in Bay Ridge, Brooklyn, the vents have been sealed.

An additional concern is that radon is a “heavy” gas and gravitates towards the floor, making it a particular danger for children and pets.

IND196-3

In 1986, the EPA set a limit for exposure to radon in air at 4 picocuries per liter. The World Health Organization and Johns Hopkins University state that 2.7 picocuries per liter would be a better standard, as humans are now exposed to radiation from multiple sources.

Assemblywoman Linda Rosenthal considers this to be such a threat to New Yorkers' health that she introduced a bill, A6863 to require suppliers of natural gas to guarantee that gas delivered to NYC does not contain unacceptable levels of radon.

http://assembly.state.ny.us/leg/?default_fld=&bn=A06863&term=2013&Summary=Y&Text=Y

Discussion of Radon in the draft EIS

Section 4.11.1.5 of the dEIS states as follows:

“Radon is a naturally occurring radioactive gas that is odorless and tasteless. It is formed from the radioactive decay of uranium (Agency for Toxic Substances and Disease Registry, 2011). Radon can be contained in fossil fuels including natural gas. Since radon is not destroyed by combustible burning natural gas containing radon can increase the level of radon within a home (Agency for Toxic Substances and Disease Registry, 2010). Several factors limit the indoor exposure to radon from natural gas. Radon's half-life, defined as the time it takes for the element to decay to half its initial concentration, is relatively short (3.8 days). The time needed to gather, process, store and deliver natural gas allows a portion of the entrained radon to decay, which decreases the amount of radon in the gas before it is used in a residence. The required venting of appliance exhausts from water heaters, furnaces, and other appliances also limits potential exposure pathways to radon emissions.”

“While the FERC has no regulatory authority to set, monitor, or respond to indoor radon levels, many local, state, and federal entities establish and enforce radon exposure standards for indoor air. It is expected that the combustion of gas

IND196-2

See Section 4.11.1.5 of the EIS and the responses to comments CM1-21 and CO11-23.

IND196-3

Comment noted.

IND196 – Sandra Stratton Gonzalez (cont'd)

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transported by the Projects would comply with all applicable air emission standards. In the unlikely event that these standards are exceeded, the necessary modification would be implemented to ensure public safety."

IND196-4 This statement includes the following half-truths and errors:

1. *"The required venting of appliance exhausts from water heaters, furnaces, and other appliances also limits potential exposure pathways to radon emissions."*

Venting requirements, as described above, are inadequate at best. In many NYC kitchens there is NO venting.

IND196-5 2. *"The time needed to gather, process, store and deliver natural gas allows a portion of the entrained radon to decay, which decreases the amount of radon in the gas before it is used in a residence."*

During peak usage, it is likely that the Marcellus gas will be delivered to NYC within a day or two. Even if it was delayed a week, it will increase the risk of lung cancer. Radon has a half-life of 3.8 days. If it takes 10 half-lives to decay to 1/1000 of the original concentration, that means it will take 38 days to decay. Because the minimum dangerous concentration if breathed gas is lower it would require twenty half-lives to decay to safe levels, or 76 days. When fully decayed, radon converts to polonium and finally lead, also dangerous substances.

Radon in Natural Gas from Marcellus Shale
By Marvin Resnikoff, Radioactive Waste Management Associates, Executive Summary[®]
<http://gdacc.org/2012/01/10/radon-in-natural-gas-from-marcellus-shale-by-marvin-resnikoff-radioactive-waste-management-associates/>

IND196-6 3. *"It is expected that the combustion of gas transported by the Projects would comply with all applicable air emission standards."*

This is a vague statement with carries no assurance of compliance to air emission standards. It cites no standards, no acceptable level of exposure, and no data collection plan. The language used, 'it is expected that,' and 'in the unlikely event,' is unprofessional, imprecise and ambiguous. In fact, this statement seems to exempt both Transco Williams and the FERC from any responsibility for emissions, but does not specify what entity will be responsible.

IND196-7 Safety must be the FERC's primary concern. Due to the issues regarding long term radon exposure in the home, anticipated increased rates of lung cancers, and the lack of any plan to measure radon exposure, I respectfully request that the FERC find the Rockaway Lateral Pipeline Project unacceptable.

Very Sincerely Yours,

Sandra Stratton Gonzalez

IND196-4 See Section 4.11.1.5 of the EIS and the responses to comments CM1-21 and CO11-23.

IND196-5 See Section 4.11.1.5 of the EIS and the responses to comments CM1-21 and CO11-23.

IND196-6 See Section 4.11.1.5 of the EIS and the responses to comments CM1-21 and CO11-23. The EPA is responsible for regulating radon.

IND196-7 Your opposition to the Rockaway Project is noted.

IND197 – Karen Orlando

12/6/2013 Response to Transco via Ecology and the Environment speaking on behalf of Transco in a letter to the US Army Corps dated Nov 5, 2013 and submitted into FERC on Dec 5, 2013

Dear Transco,

To my statement: "Fully 85 percent of the gas that will be delivered as described by both the applicant and FERC is already delivered and not incremental supply. That doesn't seem like a particularly terrific amount of new gas from this project and I wonder if this construction and all the disturbance is in the public interest."

Ecology and the Environment responded:

1. **"The Project would have a total capacity of 647,000 dekatherms per day (647 Mdth/d), of which 100 Mdth/d is incremental (i.e., an addition) to the National Grid system. The remaining 547 Mdth/d of capacity would enable National Grid to shift delivery of existing volumes from the Long Beach delivery point to this new lateral to address reliability and shifting usage patterns within National Grid's system through a new delivery point in Brooklyn. In addition to this flexibility, the Project would allow National Grid to increase the overall capacity on its system by 100 Mdth/d."**

IND197-1 Can Transco communicate just a tad more clearly than they have above, which is at best three muddled and confusing sentences, what Transco's Rockaway Lateral Project does or what its purpose is? These sentences are basically what Transco's Rockaway Lateral Resource Report number one states, correct? Documents submitted as part of NEPA should be easily understood. This is just one reason why certain intervenors said that the projects stated needs and benefits were confusing. Which company is Ecology and the Environment speaking for? Transco or National Grid? Presumably **National Grid's system capacity** is a separate thing entirely from **Transco's capacity** or is that not correct?

On Page 4-148 of the **Rockaway Lateral/Northeast Connector project FERC states:** "We Note that a **small portion** (about 15% by volume) of the natural gas to be provided by the **Projects to National grid** is incremental (ie. Additional). The majority (about 85% by volume) is replacement gas which currently is provided to National Grid via the existing delivery point in Long Beach." Projects is project with an s on the end (ie plural).

IND197-2 Can Transco clarify what the incremental supply of natural gas is from the Northeast Connector and Rockaway Lateral Projects is? Did FERC get it right in the statement above? Was that not essentially the very same thing I said to the Army Corps?

- a. Here is a video of Rep Grimm speaking on HR2606 before an empty room because that is how that bill made its way. <http://www.youtube.com/watch?v=8L15PGjiUJc>

IND197-1

The purpose and need for the Projects are described in Section 1.1 of the EIS.

IND197-2

The referenced statement is correct.

IND197 – Karen Orlando (cont'd)

IND197-3

Rep. Grimm doesn't sound like he is talking about the Rockaway Pipeline expansion. He calls it the first new bulk transmission pipeline in Brooklyn, Staten Island and Queens in more than 40 years. Isn't the Rockaway Lateral Pipeline more accurately described as a 26 inch lateral off of an existing 26 inch lateral that doesn't go through Staten Island like Transco's other pipe? Mr. Grimm says the interconnect is in Brooklyn. However the interconnect with the 26 inch pipe that National Grid recently built next to the 12 inch is in the Rockaways.

- b. Here is a link to Cas Halloway's testimony on HR2606.. Mr. Halloway sounds about as confused as Mr. Grimm on the distinction between National Grid's 12 inch pipe which feeds the Rockaways and the 26 inch for Brooklyn.
<http://naturalresources.house.gov/uploadedfiles/hallowaytestimony091511.pdf>
 "The National Grid/Williams pipeline **will increase our access to gas by 100 million cubic feet per day**, and given **the location of the Rockaways area of Queens that the gas line will serve**, and the geographic position of the Gateway Recreation Area, there is no practicable alternative to traversing beneath Parks' property" If the project serves the rockaways what is the metering station where the gas is transferred doing in Brooklyn? Did intervenors comment early on that often the line between National Grid's BQI which was reviewed as entirely independent and separate project and the Rockaway Project was more than just blurred? Who if not Transco and National Grid would the politician's be getting their information on the project from? There are 4 inlet or outlet pipes for the metering station, correct? And National Grid will have a pig launcher for the 30 inch in the M&R too, yes?

IND197-4

- 2.** Ecology and the Environment states: "According to the U.S. Coast Guard Docket No. USCG-2013-0363, an application by Liberty Natural Gas, LLC for the Port Ambrose LNG project was submitted to the USCG in September 2013. However, the Port Ambrose application **was not noticed or otherwise available to the public** until June 2014, several months after Transco's 7(c) filing for the Rockaway Delivery Lateral Project. **Therefore, Transco was not able to provide information on the Port Ambrose project in its January 2013 application.** Further, while the Port Ambrose Project proposes to connect to the Lower New York Bay Lateral(LNYBL), **the Rockaway Delivery Lateral Project has not been planned in association with this or any other LNG import terminal (or connecting pipeline) that has been proposed in the region.** Transco **takes no position on those LNG projects and will respond to any inquiries** from the developers as it **does for any entity that requests information from Transco**, consistent with Transco's legal obligation to do so as an operator of an open-access pipeline."

IND197-5

Under Dockets PF09-8 and CP13-36 Transco does not have a terrific track record for responding "to any entity that requests information" at least not responding with factual or clear information that is. Here is a news report, (let's assume the paper is an entity) where both Transco and Liberty Natural Gas LLC state their projects are unrelated.

IND197-3

See the response to comment CM1-12.

IND197-4

See the responses to comments CM1-12 and CM1-56.

IND197-5

See the response to comment CM1-43.

IND197 – Karen Orlando (cont'd)

IND197-5
(cont'd) http://www.timesledger.com/stories/2013/36/pipelineport_tl_2013_09_06_g.html "According to both Liberty Natural Gas and Williams Cos., the projects are not related." I tend to think that if Port Ambrose requires the Rockaway lateral Project in order to be a viable project then the Rockaway Lateral and Port Ambrose are related.

Would Transco answer whether or not the Port Ambrose deepwater port and pipeline project, which aims to deliver an average of approximately 400,000dths to 600,000dths into the existing NYLBL to deliver to the M&R in Long Beach, according to the information on Liberty's website and application submitted to USCG and MarAd, can be built with existing infrastructure, making "optimal use of Transco's existing LNYBL" today if approved? Is an intervenor an "entity" that Transco will respond to? When I asked a very simple question about the combined total of incremental supply from the Northeast Connector and Rockaway Lateral Projects I could not get an answer.

Would Transco like to answer what possible reason or motivation the Army Corps of Engineers would have to call Port Ambrose "proposed" in Feb 2013 if it was not in fact proposed by that date?

IND197-6 I don't think FERC has properly considered Port Ambrose in the Draft EIS. It does not appear to be an "alternative" to the Rockaway Project. It appears to me that it is dependent on the Rockaway Project. It appears to me that the Port Ambrose project cannot or will not proceed unless other actions are taken previously or simultaneously and that action is the Rockaway Lateral construction. It also appears to me that Transco is sacrificing efficiency in order to serve the flexibility of the LDC National Grid. It also appears to me that between National Grid and Transco's Rockaway Lateral/Northeast Connectors a lot of money is being spent, over \$300 million for what FERC has described as a project only in small part about new gas supplies and mostly about shifting existing supplies. It also appears to me that from the language of Port Ambrose, their claim of making optimal use of the existing Transco LNYBL, that Port Ambrose is a supplemental project. Williams is building a project that allows National Grid to shift existing supplies during peak periods and Port Ambrose is a project intended for peak periods. One is a 26 inch pipeline expansion that runs off of an existing 26 inch lateral and the other involves a 26 inch pipe delivering gas from a deepwater port to the very same 26 inch lateral. Where is the mystery?

IND197-7 The thing most striking to me though is that Liberty withdrew its application with its intent to site the project in the location it is now with the tie-in to the LNYBL at about the time almost to the date exactly that the first public meetings were held on the Rockaway Project. April 2012. And they resubmitted their project then in the week after HR2606 passed in the Senate in 2012. And they had this website that said they were going to do as much. Maybe though Liberty just has impeccable timing.

IND197-6 See the response to comment CM1-43.

IND197-7 See the response to comment CM1-43.

IND197 – Karen Orlando (cont'd)

IND197-8

- 3.** Ecology and the Environment states: "Transco cannot speak on behalf of the National Park Service, but **some park users would benefit from (a) improved visual aesthetics** of Floyd Bennett Field following rehabilitation of Hangars 1 & 2, and **(b) increased Gateway National Recreation Area funding** from Transco's lease agreement with NPS."

Transco should have ended the sentence before the word "but". The amount Transco has budgeted for the lease is around \$100,000 a year. It would take over 200 years at that lease rate to generate one year's budget for Gateway NRA. I've seen postcard letters and petitions signed by greenway users, gardeners, birders, archers and more: nearly every type of park user. And plenty more simply won't bother as they know just how long ago this was a "done deal" which FERC and Transco heard at both the public scoping meeting in the Rockaways and at Floyd Bennett Field last year. Yvette Clarke made a public statement against HR2606 based on a letter campaign by a park user.

- 4.** "The proposed Port Ambrose LNG Project is considered under Section 4.13 (Cumulative Impacts) in the FERC Draft Environmental Impact Statement for the Rockaway Delivery Lateral Project."

There is no acknowledgement in the draft EIS that the Rockaway Project is leading to the reasonably foreseeable further development of Port Ambrose. The Projects were and are being reviewed concurrently under different federal agencies. Liberty Natural Gas LLC essentially uses avoiding what the Rockaway Lateral Project does (make a beach landing, land infrastructure built in a park for good measure) as a benefit of the siting of their project.

IND197-9

It is a fairly simple question to answer. And Liberty Natural Gas LLC is past public scoping period by a few months now. At exactly what point would Transco "take a position" on whether or not Port Ambrose can tap in?

Thanks,
Karen Orlando

I am certifying that all on the service list have received this document.

IND197-8

Comment noted.

IND197-9

See the response to comment CM1-43.

IND198 – Barbara Pearson

IND198-1

Further to my comment regarding the land directly across Flatbush Avenue from Alternative Site 3, I submit a NYC Dept of Finance Tax Map, a copy of the Sundry Agreement of the New York City Economic Development Corporation for an easement on Block 8591, Lot 100 – the land directly across Flatbush Avenue from Alternative Site 3 - and an edited version of the tax map onto which I have drawn an approximation of the land covered by the easement.

Four years after Transco stated this was the preferred site for the M&R station and it was quickly thereafter deemed unavailable for this purpose, this land still appears to be well within New York City's discretion to allocate for use as an M&R facility associated with this project, the stated purpose of which is to enhance the natural gas supply of New York City.

IND198-1

See the response to comment IND177-5.

IND198 – Barbara Pearson (cont'd)

The attachments to this letter are too voluminous to include in this EIS. They are available for viewing on the FERC website at <http://www.ferc.gov>. Using the "eLibrary" link, select "General Search" from the eLibrary menu, enter the selected date range and "Docket No." excluding the last three digits (i.e., CP13-36, CP13-132, PF09-8), and follow the instructions. For assistance please contact FERC Online Support at FERCOnlineSupport@ferc.gov or toll free at 1-866-208-3676, or for TTY, contact 202-502-8659. The Category/Accession number for this submittal is 20131210-5035.

IND199 – Karina Wilkinson

December 9, 2013

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Re: Transcontinental Gas Pipeline Company, LLC. Draft Environmental Impact Statement for the Proposed Northeast Connector Project, Docket #CP13-132, CP13-13-36

Dear Secretary Bose,

I am writing to comment on the Draft Environmental Impact Statement, EIS prepared by the Federal Energy Regulatory Commission, FERC, Office of Energy Projects. I am a resident of Middlesex County, New Jersey. There are a number of issues that are not sufficiently address in the draft EIS.

Compressor Station Safety

IND199-1 Although FERC addressed scoping comments related to “Reliability and Safety” in section 4.12 of the draft EIS, safety of compressor stations was not addressed, only pipeline safety. The Transcontinental Gas Pipeline Company, Transco, has had fires or explosions at four compressor stations in the region in the last year and a half.¹

April 14, 2012	Lathrop Compressor, Springville, PA
July 23, 2012	Windsor Compressor, Windsor, NY
May 15, 2013	Williams Central Station, Brooklyn, PA
May 30, 2013	Branchburg Compressor, Branchburg, NJ

In the last explosion, thirteen workers were injured and two workers went to the hospital. Reliability and safety of Transco compressor stations and compressor stations in general need to be thoroughly addressed in the final EIS.

IND199-2 Segmentation

FERC relies on the argument that because Transco’s Northeast Connector Project and the Leidy Southeast Expansion Project will serve different customers, the projects are not improperly segmented. Three of the compressor station expansions

¹ Lathrop PA: <http://thetimes-tribune.com/news/fire-possible-explosion-at-susquehanna-gas-compressor-station-thought-to-be-accidental-1.1489789>, Windsor NY: <http://www.wbng.com/news/local/lightning-causes-compressor-explosion-163497506.html>, Brooklyn PA: <http://www.wbng.com/news/local/Late-night-gas-compression-explosion-207490961.html>, Branchburg NJ: <http://www.mycentraljersey.com/article/20130530/NJNEWS/305300063/>

IND199-1

Comment noted. Pipeline safety, including Transco's incident history, is discussed in Section 4.12 of the EIS.

IND199-2

The Northeast Connector Project and Leidy Southeast Project are separate projects. We considered the Leidy Southeast Project in our assessment of cumulative impacts in Section 4.13 of the EIS.

IND199 – Karina Wilkinson (cont’d)

IND199-2
(cont’d)

proposed in the two projects will take place at the same Lawrence Township station, station 205. All of the impacts of the two projects have not been adequately addressed in the draft EIS prepared for the Northeast Connector Project or the Environmental Assessment of the Leidy Southeast Expansion Project (docket number CP13-551). Instead of evaluating the projects in isolation, FERC needs to begin a comprehensive review of all of Transco’s proposed project for the Northeast and Mid-Atlantic. Failure to do so undermines the purpose and intent of the National Environmental Policy Act, NEPA.

IND199-3 **Noise**

While FERC is requiring a noise survey “no later than 60 days after placing the modified Compressor Station 205 in service for the Northeast Connector Project” (p. 4-163) in Lawrence Township, New Jersey, if the noise is found to exceed “an L_{dn} of 55 dBA at any nearby NSAs,” Transco is only required to report on changes within one year of the in-service date. In light of the fact that Transco has an application before FERC for another 2,000 horsepower (hp) uprate on two other engines at the same site, noise should be mitigated at the very least before construction is allowed on the Leidy Southeast Project that involves the additional 2,000 hp uprate.

IND199-4

Furthermore, FERC cites estimated “Calculated Day-Night Average Sound Levels (dBA)” at residences located 1,300 feet east and 1,600 feet north of Compressor Building A at station 205 of 50.6 and 50.4, respectively. A survey by Transco at compressor station 207 in Middlesex County measured the following: “ L_d ranged from 41.6 to 50.5 dBA and the L_{dn} ranged from 48 to 56.9 dBA for the NSAs.” (p. 4-152). FERC cites both the State of New Jersey Noise Regulations and the Lawrence Township Noise Ordinance as not allowing “a sound level in excess of 50 dBA during the nighttime (10:00pm to 7:00am).” (p.4-154).

FERC should require Transco to mitigate any noise in excess of 50 dBA at night and require the mitigation to take place as soon as it is detected. FERC should also anticipate construction noise at station 205 in Lawrence Township, if Transco’s Leidy Southeast Expansion project is approved for additional uprates to two engines.

FERC should take into account all the above concerns before issuing a final EIS for the Northeast Connector Project.

Sincerely,
Karina Wilkinson
Post Office Box 7726
North Brunswick, NJ 08902
732 839-0862

IND199-3

Comment noted. The FERC would apply the same noise standards to the Leidy Southeast Project as the Northeast Connector Project.

IND199-4

See Section 4.11.2.3 of the EIS.

IND200 – Mary Doty

	ORIGINAL
	<p>Kimberly D Bose, Secretary Federal Energy Regulatory Commission 888 First Street NE Room 1A Washington DC 20426</p> <p>2013 DEC -9 A 11:35 FEDERAL ENERGY REGULATORY COMMISSION FILED SECRETARY OF THE COMMISSION</p> <p>December 3, 2013</p>
	<p>Dear Kimberly Bose,</p> <p>I am sending you a comment about Docket No CP-13-36-0000</p> <p>I am opposed to The Rockaway Pipeline. It would Threaten The habitat and historical and recreational assets of The area.</p> <p>Also National Parks were not meant to be used for industrial purposes.</p> <p>Finally, a new pipeline would encourage fracking in New York State, and I am opposed to That.</p> <p>Sincerely, Mary Doty 34 Grove St NYC NY 10014 mdoty@verizon.net</p>

- IND200-1 Your opposition to the Rockaway Project is noted. Impacts on habitats are discussed in Sections 4.5, 4.6, and 4.7 of the EIS. Impacts on historical resources are discussed in Section 4.10.1 of the EIS.
- IND200-2 Comment noted. See the response to comment CM1-34.
- IND200-3 See the response to comment CM1-6. Impacts on the natural environment are discussed throughout the EIS.

IND201 – Robert O'Keill

FEDERAL ENERGY REGULATORY COMMISSION ROCKAWAY DELIVERY LATERAL PROJECT AND NORTHEAST CONNECTOR PROJECT (DOCKET NOS. CP13-36-000 AND CP13-132-000)	ORIGINAL
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Comments can be: (1) left with a FERC representative; (2) mailed to the addresses below or (3) electronically filed¹.

Please send copies referenced to Docket Nos. CP13-36-000 and CP13-132-000 to the addresses below.

For Official Filing (send 2 copies): Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE, Room 1A Washington, DC 20426	Another Copy (send 1 copy): Gas Branch 3, PJ-11.3 Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426
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COMMENTS: (PLEASE PRINT LEGIBLY) (attach an additional sheet if necessary)

IND201-1

I do not understand using this natural gas for the use of sending natural gas into Brooklyn. This is not using a "gas" in the proper manner. Please keep gas pipelines out of this area.

FILED
 SECRETARY OF THE
 COMMISSION
 2013 DEC 11 A P 13
 FEDERAL ENERGY
 REGULATORY COMMISSION

Commentor's Name and Mailing Address (Please print legibly)

Robert O'Keill
415 E. 12th St
Brooklyn N.Y. 11230

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(ii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "eRegister." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." In addition, there is an "eComment" option available online at: <http://www.ferc.gov/docs/filing/eComment.asp>, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account; however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. The comment period ends November 25, 2013.

IND201-1

Your opposition to use of NPS lands for the Rockaway Project is noted.

ORIGINAL

FEDERAL ENERGY REGULATORY COMMISSION

ROCKAWAY DELIVERY LATERAL PROJECT AND NORTHEAST CONNECTOR PROJECT
(DOCKET NOS. CP13-36-000 AND CP13-132-000)

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COMMENTS: (PLEASE PRINT LEGIBLY) (attach an additional sheet if necessary)

IND202-1 To Whom it May Concern,

Please reconsider your decision to dredge in the Rockaways during the summer of 2014. This scheduling and project is an improper use of our parklands and historic sites, and ~~the~~ the fact that it is occurring in the summer means that thousands could be exposed to the byproducts of this development. As a New Yorker, I don't want our public spaces to be used by utility companies. Thank you.

Commentor's Name and Mailing Address (Please print legibly)

Lyra O'Karan
11201

FILED
SECRETARY OF THE
COMMISSION

2013 DEC -9 A 11:12

FEDERAL ENERGY
REGULATORY COMMISSION

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(c)(3). The instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "eRegister." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." In addition, there is an "eComment" option available online at: <http://www.ferc.gov/docs-filing/eComment.asp>, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account; however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. The comment period ends November 25, 2013.

IND202-1

Your opposition to construction during summer and to use of public lands for the Rockaway Project is noted.

IND203 – Marcia Bernstein

ORIGINAL

FILED
SECRETARY OF THE
COMMISSION

2013 DEC -9 A 11:18
FEDERAL ENERGY
REGULATORY COMMISSION

12/4/13

To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission

Dear Ms. Bose, Re: Docket# CP13-36-000

I am writing to oppose the Rockaway Project to bring gas which is extracted from the Marcellus Shale, to Brooklyn.

This gas contains radioactive radon. I do not want this radioactive radon gas in my kitchen, particularly as I do not have a kitchen window that can be opened, & no vent to the outside.

Radioactive radon is a substance causing lung cancer in non-smokers.

Thank you very much for your attention to my letter.

Sincerely,
(Mrs) Marcia Bernstein
2212 East 26 St
Brooklyn NY 11229-4942

IND203-1

IND203-1

Your opposition to the Rockaway Project is noted. See Section 4.11.1.5 of the EIS and the responses to comments CM1-21 and CO11-23.

IND204 – Jon Pauley

<p align="center">FEDERAL ENERGY REGULATORY COMMISSION</p> <p align="center">ROCKAWAY DELIVERY LATERAL PROJECT AND NORTHEAST CONNECTOR PROJECT</p> <p align="center">(DOCKET NOS. CP13-36-000 AND CP13-132-000)</p> <p>Comments can be: (1) left with a FERC representative; (2) mailed to the addresses below or (3) electronically filed¹.</p>	
<p align="center"><i>Please send copies referenced to Docket Nos. CP13-36-000 and CP13-132-000 to the addresses below.</i></p>	
<p><u>For Official Filing (send 2 copies):</u></p> <p>Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE, Room 1A Washington, DC 20426</p>	<p><u>Another Copy (send 1 copy):</u></p> <p>Gas Branch 3, PJ-11.3 Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426</p>

COMMENTS: (PLEASE PRINT LEGIBLY) *(attach an additional sheet if necessary)*

IND204-1 I have been a resident of Brooklyn for the past 16 years. I have used the national parks & appreciate their beauty and feel lucky to have such an accessible place available to me. Therefore, I find your plan to build a natural gas facility on the land is an extremely bad & misplaced idea. This project must be reconsidered and redone altogether. Further, your timing, during peak summer months is appalling and dangerous for anyone who takes to the water. Please think about what you are planning to do and put our interests before economic ones.

IND204-2 Commentor's Name and Mailing Address (Please print legibly)
Jon Pauley
820 Washington Ave #2B
Brklyn, NY 11238

Sincerely,
Jon Pauley

FEDERAL ENERGY REGULATORY COMMISSION
2013 DEC - 14
SECRETARY'S OFFICE

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a free document process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "eRegister." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." In addition, there is an "eComment" option available online at <http://www.ferc.gov/docs/filing/eComment.asp>, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account; however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. The comment period ends November 25, 2013.

IND204-1 Your opposition to use of NPS lands for the Rockaway Project is noted.

IND204-2 Your opposition to construction during summer is noted.

IND205 – Miguel Rios

ORIGINAL

FEDERAL ENERGY REGULATORY COMMISSION

ROCKAWAY DELIVERY LATERAL PROJECT AND NORTHEAST CONNECTOR PROJECT
(DOCKET NOS. CP13-36-000 AND CP13-132-000)

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Please send copies referenced to Docket Nos. CP13-36-000 and CP13-132-000 to the addresses below.

<p><u>For Official Filing (send 2 copies):</u></p> <p>Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE, Room 1A Washington, DC 20426</p>	<p><u>Another Copy (send 1 copy):</u></p> <p>Gas Branch 3, PJ-11.3 Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426</p>
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COMMENTS: (PLEASE PRINT LEGIBLY) [attach an additional sheet if necessary]

IND205-1 *As a gateway visitor and EX-STATION ISLANDER, I believe this project with hinder local city projects & destroy a beautiful coast line. The resources that will be used for this project will be better used infor for the ~~proposed~~ proposed solar fields. Also health risks & future problems is my biggest concern.*

Commentor's Name and Mailing Address (Please print legibly)

Miguel Rios
781 Washington Ave
Brooklyn, NY 11238

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FEDERAL ENERGY
REGULATORY COMMISSION

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IND205-1

Your opposition to the Rockaway Project is noted. Impacts on the shoreline would be avoided by installing the pipeline under the shoreline using the HDD construction method. Renewable energy alternatives are discussed in Section 3.2.2 of the EIS.

IND206 – Richard D. Postal

FEDERAL ENERGY REGULATORY COMMISSION ROCKAWAY DELIVERY LATERAL PROJECT AND NORTHEAST CONNECTOR PROJECT (DOCKET NOS. CP13-36-000 AND CP13-132-000)	ORIGINAL
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Comments can be: (1) left with a FERC representative; (2) mailed to the addresses below or (3) electronically filed¹.

Please send copies referenced to Docket Nos. CP13-36-000 and CP13-132-000 to the addresses below.

For Official Filing (send 2 copies): Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE, Room 1A Washington, DC 20426	Another Copy (send 1 copy): Gas Branch 3, PJ-11.3 Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426
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COMMENTS: (PLEASE PRINT LEGIBLY) [attach an additional sheet if necessary]

I PARTICIPATED AS A VOLUNTEER FOR THE HISTORICAL AIRCRAFT RESTORATION PROGRAM & I AM A VETERAN OF THE VIETNAM ERA. THIS NATURAL GAS FACILITY DOES NOT FIT IN WITH THE HISTORICAL BACKGROUND OF THE FEDERAL PROPERTY OF FLOYD BENNETT FIELD.

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 COMMISSION
 2013 DEC 11 A 9 13
 FEDERAL ENERGY
 REGULATORY COMMISSION

Commentor's Name and Mailing Address (Please print legibly)

RICHARD D. POSTAL
1671 R-17TH ST APT K-H

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "Register." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." In addition, there is an "eComment" option available online at: <http://www.ferc.gov/docs-filing/eComment.asp>, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account; however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. The comment period ends November 25, 2013.

IND206-1

Your opposition to the use of Floyd Bennett Field for the Rockaway Project is noted.

IND207 – Karen Orlando

12/9/2013

Ms. Bose,

- IND207-1 1. After nearly 5 years of interagency meetings and numerous filings including all resource reports which stated that it was always the goal to have work offshore as far from the public park as possible by Memorial Day, an unacceptable construction schedule for prime use of Jacob Riis beach by the public has been offered by the applicant. This is an applicant that appears to have violated federal regulations in their 7c filing from January of 2013 by leaving out a necessary project, the Northeast Connector Project and stating that they had no knowledge of this project at that time. Jacob Riis beach is a primary resource of the National Park Service and this beach is used by large numbers of people primarily from Memorial Day through Labor Day. People do not use Riis and Tilden in order to watch pipeline construction unfold offshore during their leisure time. The current construction schedule will impact the most amount of people. Is this a joke? Beyond the numbers who signed petitions against the bill that would allow this right of way through the beach, most users of Jacob Riis beach likely have no idea of this project's existence, let alone that this construction will occur during prime beach season 2014. The National Park Service provided false testimony about "viewshed" in regards to the metering station being located at sites across the Belt Parkway from Gateway NRA. In addition to increased emissions which will come from construction offshore the viewshed that will be "enjoyed" next summer during construction and viewshed appears to be the primary thing thing NPS is interested in regarding this project will be effected. These impacts, while they are temporary, are entirely avoidable. People go to the beach for all kinds of reasons in the summer here in nyc, whether to cool off because temperatures are cooler by the shore, picnic, swim, bird etc.
- IND207-2
- IND207-3 2. Section 1.2 Purpose and scope of the EIS have not been fulfilled. FERC's ability to "encourage and facilitate involvement by the public and interested agencies in the environmental review process" has been severely hampered by those agencies, including most importantly the National Park Service. It was the position of the former Superintendent of Gateway national Recreation Area at a GMP meeting last fall that Floyd Bennett Field was an "industrial landscape", that decision making was already out

IND207-1 Your opposition to summer construction is noted. See the response to comment IND1-1.

IND207-2 Comment noted. Visual impacts due to offshore construction would be temporary, limited to the period of construction. Transco's proposed rehabilitation of the hangar complex would match the visual character of Floyd Bennett Field, which would avoid long-term visual impacts.

IND207-3 Comment noted.

IND207 – Karen Orlando (cont'd)

IND207-3 (cont'd)	of NPS hands at this point (this was prior to Senate approval of this legislation and the president signing public law 112-197 into public law, which does not appear to absolve NPS of any decision making authority whatsoever) among other things. It was up to the Senate and politicians at that point was her position. At that point, September 12, 2012, HR2606 was listed in Thomas as residing with the National Park Subcommittee. There was no markup on that bill, as it moved out of committee and passed in the Senate in the wee hours of the morning about 10 days later.
IND207-4	<p>3. Section 1.2.2 If the National Park Service adopts the final EIS per Title 40 CFR Part 1506.3 and FERC's is as incomplete an "appropriateness of the adaptive use" of historic hangars in Floyd Bennett Field as the draft EIS is, they will not be complying with the requirements of NEPA. "The National Park Service must comply with the requirements of NEPA prior to reaching decisions on the application for their authorizations" according to Section 1.2.2. Section 1.2.2 says nothing about NPS considering the terms and conditions of the lease of historic hangars in Floyd Bennett Field as required by Public Law 112-197:</p> <p>(b) Terms and Conditions.--A lease entered into under this section shall--</p> <p>(1) be in accordance with section 3(k) of the National Park System General Authorities Act (16 U.S.C. 1a-2(k))</p>
IND207-5	The terms and conditions of Public Law 112-197 have yet to be discussed at all in Section 106 review nor the draft EIS provided by FERC and these conditions should be part of Section 106 and the final EIS as they will be required for NPS to legally authorize a lease.
IND207-6	<p>The Final EIS needs to include discussion on how buildings and associated property leased as part of this project, Hangars 1&2 for the purpose of housing Transco and National Grid's metering and regulating station will:</p> <p>(A) shall be used for an activity that is consistent with the purposes established by law for the unit in which the building is located;</p> <p>(B) shall not result in degradation of the purposes and values of the unit; and</p> <p>(C) shall be compatible with National Park Service programs.</p>
IND207-7	<p>4. Section 1.3 Public Review and Comment: Appendix Z shows a blank page for newspaper notice on public meetings. Appendix Z has a flyer which provides inaccurate information on where national grid was in the planning stages of their project and entirely leaves any mention of the M&R located in historic hangars out. Public Review on this project under docket PF09-8 includes the applicant stating in their documents and resource reports that they first worked to introduce and pass a bill on this project prior to having public meetings to introduce the public to the project. You will not possibly be able to find a shred of paper, web notice or anything else that will ever show that NPS had ever</p>

IND207-4 Comment noted.

IND207-5 Public Law 112-97 is not the subject of this EIS.

IND207-6 The NPS and Transco have not signed a lease agreement for the hangars.

IND207-7 See the response to comment CM1-1.

IND207 – Karen Orlando (cont'd)

	sought public comment or done any outreach prior to their testimony in Congress and their work with Transco to introduce and pass HR2606.	IND207-8	Section 2.1.1 of the EIS has been updated to indicate that National Grid would own and operate the portion of the Rockaway Delivery Lateral on Triborough Bridge and Tunnel Authority (TBTA) land. National Grid would also own and operate some of the equipment in the M&R facility.
IND207-8	5. Section 2.1.1 Transco states they will own and operate all of the proposed pipeline facilities. This is contradicted by earlier resource reports and information that state that part of the M&R facilities will be National Grid's.	IND207-9	Comment noted.
IND207-9	6. Section 2.3.2 No construction mitigation for the proposed M&R facility are suggested and the impact from this activity is understated to say the least.	IND207-10	The referenced statement is correct.
IND207-10	7. Section 2.6.2 states that Transco would "routinely visit" the M&R facility. Are they speaking for National Grid or themselves? Revise.		
	8. Section 4.5.2.1 states that water-based drilling fluid with non-toxic additives as opposed to oil-based or synthetic based mud systems that have been shown to have higher chronic toxicity effects will be used. Additionally it is stated that based on the cohesive properties of the drilling fluid in saltwater, the material that is a planned release into the ocean in the HDD pit is expected to remain stable at the bottom of the exit pit and not escape into the surrounding area. Request clarification on which fluids will be selected by the contractor, brand names. Section 4.6.3.2 on Ecotoxicity seems to state that Transco has only supplied examples of additives that might be used but has not identified specific fluids that will be chosen by their subcontractor. Have they or their contractor named the specific additives yet? One would imagine that the contractor would need to order these supplies and would have some indication of exactly what they will be prior to the release of the Final EIS. Request that these specific fluids be named.	IND207-11	See Section 4.6.3.2 of the EIS.
IND207-11	9. Section 4.7.1.2. Current schedule for spring/summer construction offshore of Riis and in NY Bight is the worst for Atlantic Sturgeon juveniles, an endangered species that FERC has said the project is likely to adversely affect.	IND207-12	Comment noted.
IND207-12	10. Section 4.8.7 is completely inadequate and offensive. It is about as offensive as Stephanie Toothmans written statement to the Senate Subcommittee in question and answer form where she stated that impact on park users would be only positive. The introduction of this M&R facility, which is by its very definition alone one would be hardpressed to convince anyone is a park improvement has been sold to the public as a park improvement. This is despite community input during Floyd Bennett field planning process that seems to state the very opposite view, that the community very specifically does not want further inappropriate uses of this park.	IND207-13	Your opposition to the use of the hangars for the M&R facility is noted.
IND207-13	11. Table 4.9.6.1: Request clarification on total annual local tax revenue provided by the Rockaway Lateral/Northeast Connector projects stated in this table as supplied by The Chesapeake Group 2012. Request clarification that this annual local tax revenue is very specifically provided by Transco's pipeline facilities which as part of the Rockaway Lateral Delivery Project are located mainly in state waters, under federal property whether offshore, under Riis park and in Floyd Bennett Field. Request clarification on how these numbers are generated.	IND207-14	Revenues attributed to New York City income taxes, sales and commuter taxes, and transient accommodations are estimates based on assumptions regarding the total number of local and non-local workers, duration of construction, total person-hours worked, materials and other purchases, direct and indirect spending, and other factors. The revenue attributed to property taxes is an estimate provided by Transco. A copy of the report prepared by The Chesapeake Group was appended to Transco's application to the Commission (Appendix 5C to Resource Report 5), which is available on the FERC's eLibrary website (www.ferc.gov) under Docket No. CP13-36-000.
IND207-14	12. Section 4.9.7 is offensive. It states that no "minority or low income communities" will interact with the Rockaway Project construction and operation, which is completely	IND207-15	Comment noted.

IND207 – Karen Orlando (cont'd)

IND207-15 (cont'd)	absurd considering the actual population that uses Floyd Bennett Field and Riis beach. The statement that minority communities will only be impacted positively in that they may be part of the local labor force on the project is absurd.
IND207-16	13. Section 4.10 Cultural Resources: the national park service, legislators and to a much less degree FERC and SHPO have heard from a multitude of citizens and park users that adaptive use of these hangars for a lease to Transco and National Grid is inappropriate. FERC states that one stakeholder commented that use of the hangars would be appropriate noting that another hangar complex at Floyd Bennett Field previously was adapted for use as the Aviation Sports and Event Center. One can only assume that this stakeholder was the RPA as this is the only stakeholder to make such a statement. All other stakeholder have stated the opposite. Aviator Sports and Event Center is a concession of the National Park Service. Aviator Sports and Event Center is both open to the public and provides activities that are consistent with the park's purpose and title. The title of the park is Gateway National Recreation Area.
IND207-17	14. Section 4.11 states that there will be both noise and air pollutants introduced into Floyd Bennett Field as part of the normal operations of the M&R in historic hangars in the park. Gateway National Recreation Area was part of an NPS program that either encourages or directs that they should reduce emissions as part of park operations. It does not direct that they should actively seek out to place facilities in the park outside of the park's purpose that increase the emission released in the park.
IND207-18	15. Section 4.11.1.4 –An ICF report produced for the mayor attributes most of the boiler conversions and need for additional capacity to Con Ed not National Grid. In addition the Mayor's Plan NYC 2030 only states that it will support natural gas facilities that are appropriately sited. The Plan NYC 2030 has sections on park management, increasing access and appreciation of the waters of NYC as well as protection of the natural resources. All three will be effected negatively to some degree by either construction or operation of this project.
IND207-19	16. 4.11.2.1 Noise surveys should be repeated. They should include measurements from closer to the hangars and quieter times of day than when these measurements were taken. It does not seem clear whether the M&R will introduce any noise or not. The area will be open to the public. In fact at meetings at Aviator last year an architect told me that people could walk right up and touch the hangars as if this was a selling point.
IND207-20	17. Renderings of what the public will see when they walk up to the hangars to peer through the glass in this new attraction at the park are requested. Will the public be able to look through this glass?
IND207-21	18. 4.13 Cumulative Impacts should include impact from Port Ambrose and a discussion of how further inappropriate leases may impact Floyd Bennett Field, Gateway NRA and other National Parks, particularly in the Northeast where there are many historic structures that may be leased. Cumulative impacts from Phase 11 of National Grid's BQI which may involve a special use permit of NPS land for the HDD under the Belt parkway should be included.
Thanks, Karen Orlando I am certifying that all on the public service list have received this document	

IND207-16	Your opposition to the use of the hangars for the M&R facility is noted.
IND207-17	Comment noted. Air quality impacts are discussed in Section 4.11.1 of the EIS.
IND207-18	Comment noted.
IND207-19	Noise impacts, including noise from operation of the M&R facility, is discussed in Section 4.11.2 of the EIS.
IND207-20	See Section 4.10.1 of the EIS.
IND207-21	See the responses to comments CM1-19, IND43-1, and IND184-1.

IND208 – Karen Orlando

12/10/2013

Ms. Bose,

I am resubmitting a document where FERC was asked to either prepare a supplement to the draft EIS including impact from Port Ambrose or to prepare a revised draft EIS which includes the same. Along with this document, a document from the US Coast Guard to Liberty Natural Gas LLC was submitted. In this document, the US Coast Guard asked for documentation on existing pipeline capacity as it relates to Liberty Natural Gas LLC's application before that agency. This is presumably most importantly the existing capacity of Transco's NYLBL.

<http://www.regulations.gov/#!documentDetail;D=USCG-2013-0363-1018> That document is available at the preceding link.

IND208-1 | The reason I am resubmitting my request as an intervenor is that the previous submittal, 20131119-5002 from 11/18/2013 posted 11/19/2013 is titled: The US Coast Guard submits comments Port Ambrose DWP Timeline Suspension and Additional Data Requests under docket CP13-36.

I would like to make sure that FERC is aware that an intervenor has asked that FERC include impact from construction and operation of Port Ambrose deepwater port and pipeline project under this docket and through a revised draft EIS as Port Ambrose is a connected action reliant on the Rockaway Lateral action.

Thanks,

Karen Orlando

I am resubmitting notice of this document to all on the service list.

11/18/2013 (resubmittal)

IND208-2 | The comments herein will address certain inadequacies in the draft EIS and ask for remedy from the FERC.

- 1.) Improper Consideration of Port Ambrose as an Alternative and not as a supplemental project

IND208-1 | See the response to comment CM1-43.

IND208-2 | See the responses to comments CM1-43 and IND43-1.

IND208 – Karen Orlando (cont'd)

IND208-2
(cont'd)

- 2.) Draft EIS not sufficient as it does not include impact from proposed Port Ambrose Deepwater Port which is not only reasonably foreseeable as the application on it predates the Rockaway Lateral 7C application by several months but it also appears that Port Ambrose would not be implemented if not for the Rockaway Lateral Project.
- 3.) According to 40 CFR 1502.9 c (1) (ii) a supplement to the Rockaway Lateral/Northeast Connector should be issued which includes impact from Port Ambrose Project or alternately under 40 CFR 1502.9 a revised draft EIS should be issued. The scope of review for the Rockaway Lateral and now Northeast Connector projects should include impact from Port Ambrose.

Ms. Bose,

FERC has not properly evaluated Port Ambrose in the Rockaway Draft EIS as Port Ambrose appears to be more appropriately looked at as a supplemental project rather than an alternative to the Rockaway Lateral Project.

In Section 3.3.8 FERC has evaluated Port Ambrose Project as an “alternative” which they do not find to be reasonable or practicably preferable to the Rockaway Lateral Project. While FERC is not the lead agency for Port Ambrose NEPA review nor approval process, in the draft EIS for the Rockaway Lateral and Northeast Connector Projects they do state that even the longer length of pipeline construction portion of Port Ambrose project alone would result in greater environmental impacts than the impact from the construction of the shorter pipeline segment of the Rockaway Lateral Project.

IND208-3

When reviewing system alternatives (Transco/National Grid) to the Rockaway Lateral/Northeast Connector projects in the following Section (3.3.9) FERC says that Transco would need to take the existing LNYBL pipeline out of service so that it could be uprated pursuant to the requirements of 49 CFR 192 in order that larger volumes of natural gas of only 100,000dths could be delivered to the existing Long Beach delivery point. This is in addition to modifying and expanding the Long Beach M&R station which would also be necessary to deliver the 100,000dths incremental supply provided by the Rockaway lateral and Northeast Connector projects according to FERC’s analysis and rejection of this Transco/National Grid system alternative.

IND208-3

See the response to comment IND43-2.

IND208 – Karen Orlando (cont'd)

IND208-3
(cont'd)

Port Ambrose aims to deliver an average of 4 and up to six times this amount (average 400 MMscf/d, maximum over 600 MMscf/d) to a tie-in with the existing NYLBL to deliver to Long Beach M&R as described by Liberty Natural Gas LLC in their application submitted to USCG and MarAd dated Sept. 28, 2012. <http://www.regulations.gov/#/docketDetail;D=USCG-2013-0363> How is this possible with current infrastructure?

In evaluating Port Ambrose as an alternative to the Rockaway Lateral Project FERC appears to be implying that Port Ambrose could deliver between 400,000 and 600,000plus dths to a tie-in on the NYLBL with current infrastructure, including MAOP and M&R design and capability in Long Beach. Request clarification from FERC on this issue. Pleading that this does not appear to be factual. Pursuant to the requirements of 49 CFR 192 for Transco's existing infrastructure can Port Ambrose deliver what their project proposes to a tie-in with the existing LNYBL to deliver to Long Beach M&R? FERC should note that the pipeline design for Port Ambrose is 26 inch diameter and also proposed to operate at 960 MAOP as well.

IND208-4

On October 21, 2013, the US. Coast Guard asked Liberty Natural Gas LLC for documentation regarding **existing pipeline distribution capacity** as part of their NEPA review of Port Ambrose. Liberty Natural Gas LLC has specifically on their website claimed that making **"optimal use of existing offshore capacity"** is one of the benefits of their project. The pipeline they are referring to and the only one their project proposes to tie into is the existing Transco LNYBL, which is a 45-year-old, 26 inch pipeline currently operating at 960 psi MAOP, having only been recently uprated to that operating pressure. (see attached letter and website referred to following parenthesis) <http://portambrose.com/project-location/> As stated to FERC previously, Liberty Natural Gas LLC also boasts no coastal land use as one of their benefits and in their application also boast their avoidance of a beach landing for any pipeline as one of their benefits or selling points. Request that FERC take a closer look at whether or not capacity currently exists in the LNYBL pursuant to the regulations required by PHMSA for Port Ambrose to be built as described.

IND208-4

See the responses to comments CM1-43 and IND43-2.

IND208-5

Request that if FERC finds that it is not possible for Port Ambrose to build their project as described pursuant to the requirements of 49 CFR 192 for the existing LNYBL and existing M&R in Long Beach, it also then is likely that Port Ambrose would not be implemented as currently described without the Rockaway Lateral being built so request that a supplemental

IND208-5

See the responses to comments CM1-43 and IND43-2.

IND208 – Karen Orlando (cont'd)

IND208-5
(cont'd)

draft EIS be provided as the current draft EIS for the Rockaway Lateral/Northeast Connector projects which lacks cumulative or indirect impact from Port Ambrose is not sufficient. FERC should note that all configurations being considered for Port Ambrose, even a location many miles east and with a much longer corresponding pipeline, include a tie-in to the existing NYLBL.

Pursuant to 40 CFR 1502.9 c (1) (ii), FERC should issue a supplement to the draft EIS or alternately under 40 CFR 1502.9 a FERC should issue a revised draft EIS which includes impact from Port Ambrose. FERC should consider that the issues raised herein are substantive and neither the scope for environmental review nor the draft EIS issued are sufficient.

IND208-6

FERC should consider that not only should Williams Transco have provided factual information on the Port Ambrose Project in their Resource Reports submitted in January 2013, but that FERC should consider the possibility that Transco under Part 157 (**§157.6**) should also have made a full statement on the Port Ambrose application and defined it as supplemental in order to be compliant with required regulations. Liberty Natural Gas LLC appears very much to be describing their project as supplemental when stating they will be making optimal use of the existing offshore pipeline capacity of Transco's NYLBL. The application for Port Ambrose was submitted while Transco was in prefile and moreover Liberty had stated their intent to reapply with their new preferred site in early 2012, prior to public scoping period on the Rockaway Lateral project. As even National Grid was aware of Liberty Natural Gas LLC intent to build Port Ambrose, having presented with them at a Long Island Association meeting in September 2012, it seems very unlikely that Transco was unaware of the Port Ambrose project throughout 2012 and highly unlikely that they were unaware when submitting their resource reports in January 2013 either.
<http://www.longislandassociation.org/news.cfm/2012/past-events/lia-energy-environment-committee-natural-gas-day>

IND208-7

Transco's 3/19/2013 response to the Army Corps February 2013 request that they contact the USCG about the currently proposed Port Ambrose project under docket CP13-36 was the following: "There are no public dockets pending with the U.S. Coast Guard for Liberty Natural Gas projects in New York waters (see <http://www.uscg.mil/hq/cg5/cg522/cg5225/dwp.asp>). **The most recent application filed for Liberty Natural Gas with the U.S. Department of**

IND208-6

See the response to comment CM1-43.

IND208-7

Comment noted. See the response to comment CM1-43.

IND208 – Karen Orlando (cont'd)

IND208-7
(cont'd)

Transportation Maritime Administration was withdrawn in a letter dated April 10, 2012 (Docket No. USCG-2010-0993)." -- Whether or not there was a public docket was not what was asked of Transco by the Army Corps. At that time Liberty Natural Gas LLC's most recent application was not the withdrawn application from earlier in 2012 but the application submitted in September 2012. It is not believable that Transco or their contractors acting for them in response could not have been able to access factual information about Port Ambrose and supply it to the Army Corps, FERC and to the public under docket CP13-36.

IND208-8

How many flags need to be raised and waved and waved and waved furiously before the FERC pays attention to what is transpiring under this docket and responds appropriately? Exactly how much non factual and misleading information is Transco going to be allowed to present to the public and to federal agencies under this docket?

I am an intervenor in this process.

Thanks,




Karen Orlando

I am certifying that all on the service list have received this document.




IND208-8

Comment noted.

IND209 – Joseph Nerone

Joseph N. Nerone
487 St. John's Pl.
Apartment 1d
Brooklyn, NY 11238

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JUL - 9 A 11:39
FEDERAL ENERGY
REGULATORY COMMISSION

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, D.C. 20426

November 24, 2013

In the Matter of

Transcontinental Gas Pipe Line Company, LLC)	Docket No. CP13-36-000 and PF09-08-000
Application of Public Convenience and Necessity))	
)	
and)	
)	
Federal Energy Regulatory Commission Office of Energy Projects)	FERC/EIS-0246D

IND209-1 As a member of the community that will be impacted by the Rockaway Delivery Lateral Project I take exception to the proceedings and plea that the Office of Energy Projects dismiss this project for numerous violations of law and public trust. I speak for the millions of Gateway National Recreation Area users when I say this project is an assault on our National Heritage.

IND209-2 The Project presented to Congress that allows this misuse of a National Heritage District could not deliver what was promised (more gas), and due to negligence of the applicant will now impact and endanger the public with a new summer time 2014 construction schedule. The change in the construction schedule for the pipeline portion of this project renders the Draft Environmental Impact Statement irrelevant and violates Title 40 CFR 1502.9. Therefore I demand the FERC prepare and circulate a revised Draft EIS.

My Complaints with Transco's 7-C Application

IND209-3 Transcontinental Gas Pipe Line Company, LLC Application for Certificate of Public Convenience and Necessity, first paragraph states in so many words "The Rockaway Delivery Lateral Project will provide a new delivery point into New York City and provide 647,000 dekatherms per day of natural gas". The Rockaway Project is a new delivery point through the third most visited National Park in the United States. The Northeast Connector Project is necessary for Transco to deliver 647,000 dekatherms per day. This is in violation of 18 CFR 1c.1 Prohibition of natural gas market manipulation, part (a) (2) and 380.12 Environmental reports for Natural Gas Act applications, parts (b) (3) and (c) (2).

(1)

IND209-1 Your opposition to the Rockaway Project is noted.

IND209-2 See the responses to comments CM1-12 and CM1-14.

IND209-3 See the response to comment IND1-1.

IND209 – Joseph Nerone (cont'd)

- IND209-4 Transco willfully omitted the Northeast Connector Project in their application for the Rockaway Delivery Lateral Project. The Rockaway Project could not deliver an incremental increase of 15% without the Northeast Connector Project. Transcontinental not only misled the FERC but also Congress, who was passing legislation to allow this assault on our National Park. The Northeast Connector Project would not be necessary and would not be implemented if not for the Rockaway Project, therefore Transco also violated 18 CFR 157.6 Applications; general requirements, (b)(5).
- IND209-5 This Project is clearly an assault on our National Park. Interstate gas pipeline companies do not spend over \$182.8 million in order to operate over 15 miles of natural gas pipelines in the most expensive market in the country at half capacity! There is no reason for Transco to falsely label the Liberty Natural Gas, LLC Port Ambrose LNG Project as an alternative to the Rockaway Project. The Port Ambrose Project would not be necessary, would not be implemented, and would not be possible if not for the Rockaway Project. Transco violated 18 CFR 380.12 Environmental Reports for Natural Gas Act applications, parts (b) and (c) by describing the Port Ambrose Project as an alternative when in fact it is dependent on the Rockaway Project.
- The Port Ambrose LNG Project was a foreseeable future action therefore impacts should have been introduced during the scoping period of the Rockaway Project. The Navy OPEREA mid-Atlantic strata shows the same whales, dolphins, and seals will be affected by both Liberty's and Transco's Projects so the cumulative impacts from both projects would effect the same resource category as described, but ignored in FERC/EIS-0246D page 4-179 violating 40 CFR 1508.7 Cumulative impact.
- IND209-6 Transcontinental's Rockaway Project application often quotes from April 2011 update of PlaNYC but fails to include the first sentence of the paragraph which states "To ease supply constraints we will assist developers in obtaining permits and approvals for appropriately-sited natural gas transmission lines". The proposed industrial gas facility in a National/State Register Historic District at Gateway National Recreation Area violates 16 USC 4601 Take Pride in America Program (b)(1) (a) & (b). The adaptive reuse of Hangars 1&2 will never allow the public to enter the buildings, has nothing to do with recreation or the National Park Service, and will not help the public interpret our national heritage in aviation history.
- IND209-7 The National Park Service violated the public trust and gave false testimony to Congress; in order to pass "NYC Natural Gas Supply Enhancement Act";
- * by never presenting this "boon" to our National Park
 - * testified in Congress twice "No impact, environmental or otherwise" before public scoping and Environmental Impact Statement was prepared
 - * the Honorable Doc Hastings February 6, 2012 testimony describes the Project as a benefit to Gateway NRA, states the NPS already made an agreement for the lease of hangars 1 & 2, and claims New York City enthusiastically embraced this project when in fact the public was not aware of the proposal
 - * describes a "restoration" not "rehabilitation"
 - * failed to protect the public by allowing a summertime pipe line construction schedule in the countries third most visited National Park.

(2)

IND209-4 See the responses to comments CM1-12 and IND1-1.

IND209-5 See the responses to comments CM1-43 and IND43-1.

IND209-6 Comment noted.

IND209-7 See the responses to comments CM1-12 and CM1-14.

IND209 – Joseph Nerone (cont'd)

40 CFR 1502.9 Draft, final, and supplemental statements.

(a) Draft environmental statements shall be prepared in accordance with the scope decided upon in the scoping process. The lead agency shall work with the cooperating agencies and shall obtain comments as required in part 1503 of this chapter. The draft statement must fulfill and satisfy to the fullest extent possible the requirements established for the final statements in section 102 (2)(c) of the Act. If a Draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion. The agency shall make every effort to disclose and discuss at appropriate points in the draft statement all major points of view on the environmental impacts of the alternatives including the proposed action.

IND209-8

- * The northeast Connector Project was not part of the scoping process violating 40 CFR 1502.9
- * The lead agency, FERC, is not collecting all comments from cooperating agencies. I Mailed copies of over 400 handwritten letters in opposition to leasing our National Park buildings to National Park Service Gateway NRA Superintendent Linda Canzanelli and Northeast Region Director Dennis Reidenbach, these letters need to be considered in the section 106 part of this process.
- * The new pipeline construction schedule makes the FERC Draft EIS so inadequate and irrelevant as to preclude any meaningful analysis. To move forward without issuing a new Draft EIS would violate 40 CFR 1502.9.
- * The FERC is not carefully considering nor truly describing alternatives to the projects in violation to 40 CFR 1502.9;
 1. The liberty Port Ambrose Project is unlawfully described as an alternative when it is in fact dependent on the Rockaway Project.
 2. New pipeline construction of 10 miles by the local distribution company (National Grid) through developed city streets would resolve the system constraints and Transco could uprate the Long Beach M & R Facility and most importantly, we would not be alienating and misusing our National Park in the densest city in the United States.
 3. National Grid will still need to construct 10 miles of pipelines through Hewlett, Long Island.

*New York City metropolitan area lies within 150 miles of the Marcellus Shale natural gas play, one of the worlds largest reserves of natural gas.
 IND209-9 The Federal Energy Regulatory Commission is violating their Congressional mandate if they issue permits for construction of the Rockaway Project that will enable Liberty Natural Gas, LLC to import natural gas from Trinidad and Tobago.

IND209-10

I made comments during the two public comment meetings on October 22 and 23, 2013 and wish my comments made at that time are also carefully considered.

IND209-11

Please peruse my enclosed list of complaints with the Draft Environmental Impact Statement. By submitting comments on the draft statement I am not agreeing to accept this draft EIS as a complete draft as applicable to 40 CFR 1502.9 therefore this list of complaints with the draft EIS is also incomplete.

(3)

IND209-8

See the responses to comments CM1-1, CM1-14, CM1-43, CM1-122, and IND1-1. The NPS has not provided the Commission with copies of any comment letters. All comment letters submitted to the Commission have been placed in the dockets for the Projects.

IND209-9

See the response to comment CM1-43. The Projects do not involve the import or export of natural gas; the Projects would provide natural gas to New York City.

IND209-10

We consider all comments submitted to the Commission. See the responses to comments CM1-117 through CM1-141 and CM2-65 through CM2-71.

IND209-11

Comment noted. See the response to comment CM1-122.

IND209 – Joseph Nerone (cont'd)

List of Complaints with FERC/EIS-02460

- IND209-12 | 1. **ES-1 Introduction** fails to discuss Liberty Natural Gas, LLC Port Ambrose Project which would not be necessary and would not be implemented if not for the Rockaway Lateral Delivery Project which violates numerous laws.
- IND209-13 | 2. **Page 1-3 Figure 1-1** needs to show the National Grid Brooklyn/Queens Inter-connect Project, without it the map is confusing.
3. **Page 1-4 Figure 1-2** falsely shows the Lower New York Bay Lateral connecting to points north of Edison, New Jersey and not the pipeline nearest Compressor Station 207.
- IND209-14 | 4. **Page 1-8 Public Review and Comment** was not started until after the National Park Service falsely testified in Congress twice "No impact, environmental or otherwise" in order to pass necessary legislation.
- IND209-15 | 5. **Pages 1-10&11. Table 1.3-1** needs to include increased automobile accidents on Flatbush Avenue. National Grid BQI Phase 1 was a cause for more automobile crashes.
- IND209-16 | 6. **Page 1-13. Figure 1.4-1** is incomplete and misleading. According to this map National Grid has no natural gas pipelines in the Rockaways. We know from the scoping period for this project that natural gas comes to New York City Markets, specifically the Rockaways, from Long Beach, Long Island M&R Station.
- IND209-17 | 7. **Page 2-12. Figure 2.2.2-1** needs more NPS scrutiny because the path from the access road to the M&R site has an existing guardrail and is densely used.
- IND209-18 | 8. **Page 2-31 M&R Facility Construction Procedures** is impossible to execute with the new construction schedule submitted to FERC 10/18/2013, which states it would take 14 months to build the M&R and rehabilitate the Historic Hangars. There is simply not enough time to meet Transco's fabricated, in service date of November, 2014.
- IND209-19 | 9. **Page 2-35 Aboveground Facilities** would not be maintained by Transco in accordance with Department of Transportation regulations and Transco's problems with D.O.T. Pipeline and Hazardous Material Safety Administration regulations is well documented, some local examples would include:
*CFR 1-2001-1015. \$50,000 fine for not having a written manual for operation and maintenance of an Emergency Response.
*CFR 1-2012-3003m violations for corrosion control, fire protection operations, and remote control shutdown devices.
- IND209-20 | 10. **Page 3-14 Port Ambrose Project** is not an alternative system, and see above complaint #1.
- IND209-21 | 11. **Page 3-15 Transco System Alternatives, Long Beach Delivery Point** supports the fact that the Rockaway Project is overbuilding and should be addressed by the Local Distribution Company of natural gas to New York City and not be built through the nation's third most visited National Park.

(4)

- IND209-12 | See the response to comment CM1-43.
- IND209-13 | Figure 1-1 of the EIS depicts the facilities proposed by Transco for the Rockaway Project. Figure 1-4 of the EIS depicts the location of the BQI Project relative to the Rockaway Project. Figure 1-2 of the EIS depicts the relationship of the Northeast Connector Project to the Rockaway Project. The location of Transco's existing system in this figure is an approximation based on a digital data layer of energy industry systems from Rextag (2013).
- IND209-14 | See the response to comment CM1-1.
- IND209-15 | Impacts associated with transportation and traffic are discussed in Sections 4.9.4 and 4.13.11 of the EIS.
- IND209-16 | The intent of Figure 1.4-1 of the EIS is to depict the relationship of the BQI Project to the Projects.
- IND209-17 | NPS staff reviewed administrative drafts of both the draft and final EIS.
- IND209-18 | Construction of the M&R facility would take approximately 6 months. Up to 14 months could be required to rehabilitate the hangars.
- IND209-19 | Transco is required to maintain its facilities in accordance with the DOT's Minimum Federal Safety Standards in 49 CFR Part 192.
- IND209-20 | See the response to comment CM1-43.
- IND209-21 | Comment noted. The purpose and need for the Projects are discussed in Section 1.1 of the EIS.

IND209 – Joseph Nerone (cont'd)

IND209-22	12. Page 3-30. M&R Facility Alternative 3 falsely states that Marine Park is Brooklyn's largest park whereas the largest park in Brooklyn is Floyd Bennett Field at 1,448 acres (Field Guide to the Natural World of New York City, Leslie Day, 2007, The Johns Hopkins University Press).
IND209-23	13. Page 4-6 General Impacts and Mitigation is incomplete and false. As required by NYSDEC the National Grid BQI HDD process was not recorded by the HDD engineer, when I saw and reported Frack-out to NYSDEC they investigated and found no records of HDD pressure for the prior two weeks. The BQI HDD encountered every problem and more than is described in the draft EIS, they abandoned a drill hole because the drill bit got stuck, encountered frack-out, and lost a week of work because the pull-back of pipeline also got stuck. The draft EIS should go into some of this detail more closely.
IND209-24	14. Page 4-6. FERC recommend that; an experienced HDD engineer evaluate the project feasibility of the HDD route is wise because there will be thousands of people on the beach when some of these problems could happen.
IND209-25	15. Page 4-10 The draft EIS needs to more fully explain how it does not anticipate any issues related to resuspension of mercury at a crowded beach when sediment sample MP1.0, 11-DO-1E had mercury levels that exceed TOGS 5.1.9. Class A threshold limits. I recommend more sediment sampling.
IND209-26	16. Page 4-18 Horizontal Directional Drill exit hole is a disaster and needs more explanation of how this is considered "mitigation". These impacts are unacceptable at a busy beach during peak summer season. *NYSDEC has expressed concerns about the stability of drilling fluids and cuttings in the pit when a top layer is added (ie., potential displacement), meeting summary 9/24/2013. *The Army Core of Engineers questions how this planned release and fill will comply with 40 CFR 230.404 (b) 1.
IND209-27	17. Page 4-25 Wildlife Resources fails to mention the approximate 9 acres of land that is maintained by the Floyd Bennett Gardens Association, the largest garden on the east coast which feeds over 420 families and contributes thousands of volunteer hours to Gateway National Recreation Area a year.
IND209-28	18. Page 4-26. Table 4.5.1-1 Terrestrial species is inadequate, it fails to mention animals I have seen in the park like turkey vultures (6, Mar.2013), rabbits, snakes and opossum, and more. Please consult with the Cornell Co-operative extension because as I mentioned in the scoping period for this project they reintroduced the Black Racer snake to this park and I saw one in this park, and it was fast.
IND209-29	19. Page 4-30 Horizontal Directional Drilling. States "water-based drilling fluid with non-toxic additives", the FERC has no business making this untrue statement, please read Resource Report 2, Appendix 2f, <u>These additives are toxic!</u>

(5)

IND209-22	Marine Park is Brooklyn's largest park according to the City of New York Parks and Recreation Department (http://www.nycgovparks.org/parks/marinepark).
IND209-23	Comment noted. The HDD for the BQI Project was successfully installed.
IND209-24	See the response to comment CO11-35.
IND209-25	See the response to comment CM1-85.
IND209-26	Impacts associated with the HDD are addressed throughout the EIS.
IND209-27	Impacts on the Floyd Bennett Field Community Garden are addressed in Sections 4.8.7, 4.11.2, and 4.11.3 of the EIS.
IND209-28	Table 4.5.1-1 of the EIS provides a representative, not an exhaustive, list of species in the Rockaway Project area.
IND209-29	See Section 4.6.3.2 of the EIS. The additives are not expected to create acutely toxic conditions based on the concentration of the additives in the fluid.

IND209 – Joseph Nerone (cont'd)

- IND209-30 20. Page 4-32 first paragraph "Inadvertent releases of drilling fluid outside of the HDD exit pit are possible but not expected". Transco has no formal monitoring procedures for the area between the exit pit and the shore. This whole paragraph is nonsense. Any weekend between Memorial Day and Labor Day there are thousands of people sitting on the beach, which is directly over the first bend of the HDD pipeline. If Transco is on schedule they will be reaming this hole on the July 4th weekend, 2014 so please also see above complaints # 13 & 14.
- IND209-31 21. Page 4-32 Hydrostatic Test Water Withdrawal and Discharge. Over 530,000 gallons of hydrostatic test water that is treated with toxic chemicals (see RR 2, Append. 2f) will be released through a multi-port diffuser near the busiest beaches in the country during peak season! Transco has not submitted a model nor described this multi-port diffuser. I do not want to be swimming in a planned release of chemicals that are listed as carcinogens in the state of California (see prop. 65).
- IND209-32 22. Page 4-33 Marine Mammal Impacts. I do not understand why the draft EIS would make such false statements as "marine mammals are highly unlikely to be present in the Rockaway project area". Please watch on Youtube "Rockaway beach whales New York City" Published September 24, 2013 by Bobby Leonard.
- IND209-33 23. Page 4-35 Table 4.5.2-2 needs to be corrected and subject to closer scrutiny. To apply for over 200 takes by Level B Harassment with no Level A Harassments is wrong. Source: Navy Operating Area (OPERA). The Liberty Port Ambrose Project is in the mid-Atlantic OPERA and therefore the very same marine mammals that are impacted from this project could be impacted by Liberty's which is never discussed in this draft EIS and violates numerous laws.
- IND209-34 24. page 4-38 FERC recommend a NOAA Fisheries Service-approved observers be on all vessels to maintain a vigilant watch for marine mammals. The Biological Assessment, 8.0, Table 9 (addendum submitted 9/24/2013) states crew members can do this job which is an unacceptable risk to endangered species that could be present in the area.
- IND209-35 25. Page 4-45. Timing of Construction. The water temperature for the first of March is irrelevant considering the new construction schedule...This is also in violation of 40 CFR 1502.9.
- IND209-36 26. Page 4-55 Noise Effects on Fish. Falsely states that all the piles would be installed and removed over a period of approximately one week".
 * The Biological Assessment, Mitigation Measures, Table 9 ; Addendum states "A vibratory hammer will be used for pile driving to reduce in-water noise -Total operation time for vibratory pile driving will be less than two hours over approximately ten days (each for installation and extraction)
 * September 18, 2013 Meeting Summary raised issues with noise effects. Danielle Palmer, NOAA National Marine Fisheries Service questioned the calculations for the thresholds and stated thresholds for some species were not accurate.
 The draft concludes pile driving would not have significant impact on fish in the vicinity but if we double the time of pile driving and change the timing to the warmest months of the year surely this would have a significant impact on fish.

(6)

- IND209-30 Monitoring for an inadvertent release of drilling fluid is discussed in Section 4.1.7 of the EIS. Additionally, Transco has stated that inspection personnel on the vessels beyond the exit pit would visually inspect the areas at least twice daily.
- IND209-31 The discharge of hydrostatic test water would occur more than 0.5 mile offshore and would not impact people using the beach. The toxicity of the additives is discussed in Section 4.6.3.2 of the EIS. Discharge of the hydrostatic test water is not expected to create acutely toxic conditions.
- IND209-32 Section 4.5.2.2 of the EIS has been updated based on additional information filed by Transco and comments we received from NOAA Fisheries. Six marine mammal species are highly unlikely to be present in the Rockaway Project area during construction. Impacts on the seven species that could be present in the Rockaway Project area during construction are assessed in this section.
- IND209-33 Transco calculated the number of takes using methodologies approved by NOAA Fisheries. See the responses to comments CM1-43 and IND43-1.
- IND209-34 Transco committed to providing NOAA Fisheries-approved observers for marine mammals and other marine species as described in the EIS. In addition to these observers, vessel operators or their crews would be trained to watch for right whales and sea turtles to avoid vessel collisions.
- IND209-35 See the response to comment CM1-14.
- IND209-36 The EIS has been updated to clarify that piles would be installed and removed over a period of 10 days each. Transco estimates that it would take approximately 60 seconds of continuous vibratory driving to install and remove each pile. Therefore, the total operating time for the vibratory hammer would be about 70 minutes spread over a period of 10 days each for installation and removal of the piles.

IND209 – Joseph Nerone (cont'd)

IND209-37	27. 4-55 Release of HDD Drilling Fluid and Cuttings. The drilling fluid is expected to remain in exit pit based on experience with Transco HDD in Tampa Bay, Florida, not the Atlantic coastal waters. Please see complaints # 16,19, and 20.
IND209-38	28. Page 4-57. Biocides and Other Chemical Additives in the Hydrostatic Test Water. The draft EIS is using outdated information and ignoring the dangers of this release into the water that will occur around the July 4th weekend at crowded city beaches. See complaints #19 & 21 and MSDS, published 2008 and for your convenience here is section 11 Toxicological information from the MSDS for X-CIDE 750 Industrial Biocide. Chronic Toxicity Data 1) Tetrakis (hydroxymethyl) phosphonium sulfate Tetrakis(hydroxymethyl) phosphonium sulfate (THPS) is a component of this product. THPS contains a material which has caused liver damage in rats.... THPS caused cell type mutations in mice lymphocytes at a dose of 6 mg/L, and cell type mutations in hamster lung cells... In a rabbit study animals fed this product during pregnancy produced an increase in the number of offspring with eye abnormalities and/or skeletal variations... Section 14 Transport Information for this Biocide. The DOT Classification is Toxic, Liquids, Organic, N.O.S., 6.1 UN2810, III
IND209-39	29. Page 4-60 Threatened, Endangered, and Other Special Status Species. Entire section is meaningless considering the new construction schedule and violates 40 CFR 1502.9.
IND209-40	30. Page 4-65 Figure 4.7.1-1. This is a good figure and validates complaints # 1, 10, 19 thru 29.
IND209-41	31. Page 4-93 Land Use, Recreation. The NPS draft General Management Plan/EIS issued on August 2, 2013 is a failure on so many levels I could not address them all here due to space limitations. One failure worth mentioning of the NPS draft GMP/EIS is the lack of discussion of the 100 Year Anniversary of Floyd Bennett Field as New York City's first municipal airport and the effect of the Metering & Regulating Facility on possible 2032 Summer Olympic Games to be held in New York City.
IND209-42	32. Page 4-105 Vessel Traffic. This is another meaningless section considering the new construction schedule, violating 40 CFR 1502.9.
IND209-43	33. Page 4-109 Recreation and Special Use Areas. From the inception of this Project, off-peak construction schedule was the major selling point to the public and Congress. The new schedule for Peak-Season construction at the Countries third most visited National Park is no good. Perhaps this is a good section of the draft EIS to discuss the First Amendment Areas in the Park.
IND209-44	34. Page 4-111. States "Transco would erect tents and/or screens around the HDD machinery" even though National Grid said the same thing in their EAS for the BQI but failed to do so. They actually had to incidents where oil/mud was blown out and across the bicycle path before they erected a small screen.

(7)

IND209-37 Comment noted.

IND209-38 See the response to comment IND209-31.

IND209-39 See the response to comment CM1-14.

IND209-40 Comment noted.

IND209-41 Neither the draft GMP/EIS for the GNRA nor the 2032 summer Olympics (which have not been awarded) are the subject of this EIS.

IND209-42 Section 4.8.4.2 of the EIS has been updated to provide additional information on vessel traffic. See the response to comment CM1-14.

IND209-43 Your opposition to Transco's proposed construction schedule is noted. See the response to comment CM1-14.

IND209-44 See the response to comment CM2-19.

IND209 – Joseph Nerone (cont'd)

- IND209-43 35. Page 4-111. States, "During the HDD crossing there is potential for ground surface disturbance if an unanticipated, inadvertent return of drilling fluid surfaces along the HDD alignment. An inadvertent release of drilling fluid in Jacob Riis Park could temporarily affect park users". Transco and/or cooperating agencies have not submitted to date an evacuation of crowds at the beach in the event of an accidental release of HDD drilling fluid. Appendix H of the FERC/EIS 0246D does not discuss the possible beach evacuation therefore, it is impossible to analyze the environmental consequences from the draft EIS which violates 40 CFR 1502.9.
- IND209-46 36. Page 4-112 fourth paragraph discusses M&R construction noise on gardeners and Ecology Village Campsite but not the hundreds of park users in the vicinity, precluding serious analysis of this draft EIS.
- IND209-47 37. Page 4-112 Hoover & Keith, Inc. noise study lacked important data to properly analyze environmental impacts for the operation of the M&R facility such as include the 8 or more 2 hp exhaust fans to be mounted on the roof of the N/SRHO Historic Hangars at Floyd Bennett Field at Gateway National Recreation Area.
- IND209-48 38. Page 4-124 states, "Activities during construction would occur in non-residential areas where no EJ communities are present. These areas do not possess minority or low income communities, and it is unlikely that minority communities would interact with Rockaway Project construction activities or operations, except through potential employment as part of the local labor force. Based on this, we do not believe the Rockaway Project would have an impact on potential EJ communities". I underlined the most offensive part of the draft EIS and I can only conclude the DEIS did not consider the 300,000 park users that can walk to the in 20 minutes in violation of 1502.9
- IND209-49 39. Page 4-125 Cultural Resource Surveys states "Transco proposes to use approximately 7.6 acres of existing public roads... these consist of existing that would not be modified for construction". See #7 above. the modification of gaurd rail to turn left off the access road directs traffic between the kite-flying field and the community gardens.
- IND209-50 40. Page 4-131 states, "One stakeholder commented that use of the hangars would be appropriate noting that another hangar complex at Floyd Bennett Field previously was adapted for use as the Aviation Sports and Events Center". Aviator Sports and Recreation Center serves the publics need for recreation and meets Gateway NRA criteria for adaptive re-use unlike a natural gas facility. The referenced stakeholder could not walk to the park in 20 minutes because they live on the upper west side of Manhattan (@17 miles away) and the Regional Planning Association comments should be balanced out by the National Parks Conservation Association Letter in FERC PF09-08-000 dated June 24, 2012.
- IND209-51 41. General Impact and Mitigation section is dramatically flawed in every way. Please see above complaints on this page and there has been no outreach, the section 106 compliance will occur on the beach, peak season, from Transco information and education booths on the boardwalk.

(8)

- IND209-45 Typically, evacuation would be unnecessary in the event of an inadvertent return on the beach or in the nearshore area. In the unlikely event that this occurs, Transco would cordon off the affected area and remove the drilling mud in accordance with its HDD Monitoring and Contingency Plan (see Appendix H).
- IND209-46 Construction noise would have the greatest impact on individuals using the Community Garden at Floyd Bennett Field. Construction noise could impact other users of Floyd Bennett Field, but the impact would decrease with increasing distance from the workspace at the proposed M&R facility site. Additionally, construction noise would be a temporary impact.
- IND209-47 The referenced noise study included noise impacts from the exhaust fans.
- IND209-48 There is no evidence that Transco's proposed facilities on NPS lands would cause a disproportionate share of adverse environmental or socioeconomic impacts on any racial, ethnic, or socioeconomic group. See Section 4.9.7 of the EIS.
- IND209-49 No ground-disturbing activities are proposed for the access roads. Use of the roads would not impact archaeological sites.
- IND209-50 Comment noted.
- IND209-51 Comment noted.

IND209 – Joseph Nerone (cont'd)

- IND209-52 42. Page 4-140 Prevention of Significant Deterioration and Nonattainment Review. This section of the draft EIS is inconsistent with the NPS Management Policy. To state the Federal Park Land is not subject to the EPA's PSD program review is a violation of 40 CFR 1502.9.
- IND209-53 43. Page 4-146 Operational Emissions. States, "No other consequential emissions would occur during the operation of the M&R facility", which is not true because every 7 years pig launching/receiving would occur in our National Park and this process would result in emissions of methane.
- IND209-54 44. Page 4-148 states, "We note that a small portion (about 15 percent by volume) of natural gas to be provided by the Projects to National Grid is incremental (i.e., additional). The majority (about 85 percent by volume) is replacement gas, which currently is provided to National Grid via the existing delivery point in Long Beach".
 * This statement from the DEIS shows the extent of the lies told to Congress in order to pass the enabling legislation.
 *Transco omitted the Northeast Connector Project which was necessary to provide the 15% incremental increase in natural gas, which violates 18 CFR 1, 380.12, 157.6, 40 CFR 1508.7, 16 USC 4601, and 40 CFR 1502.9.
 * Please see above complaints #11 overbuilding/LDC concern, 31 Floyd Bennett field Future as a National Park or Industrial Park, 38 Environmental Justice, 40 Inappropriate re-use, and 41 No Section 106 Process.
- IND209-55 45. Page 4-159 Operational Noise. I object to the Hoover and Keith, Inc Noise Study. The NSA #3 (community gardens) was situated too far from the gardens. See above complaint #37 Insufficient Data for Noise Study.
- IND209-56 46. Page 4-163-165 FERC recommends that Transco file noise surveys for the NE Connector Project and they should require the same for the Rockaway Project. I understand this is a non-residential area but 300,000 people live within a 20 minute walking distance to this National Park (the third most visited in the country).
- IND209-57 47. Reliability and Safety. The discussion of this part of the DEIS should be put in the context of the National Park Service Mission and Management Policy.
- IND209-58 48. Page 4-171 Safety Standards. States, "Transco uses an additional internal Pipeline inspection tool, known as a "smart pig". I have not yet recieved an answer that I asked the FERC several times already; How many pig launchers/-recievers will we have in Gateway National Recreational Area? Maybe the FERC could be more clear on this in the final EIS.
- IND209-59 49. Page 4-174, Table 4.12.2-3 data needs to be updated.
- IND209-60 50. Page 4-175 states, "Transco has never had an offshore pipeline incident (Garber et al., 2000)". 1. We need current statistics on this. 2. What about facilities?
 "Transco uses automatic rupture-detection valves in lieu of remote-controlled shut-off valves" and goes on to say "remote-controlled valves may be closed within 90 seconds of a shut-off command from Transco's Gas Control Center". This needs to be more clear on exactly what they can do especially considering above Complaint # 9 Transco's real DOWHESA Track Record.

(9)

IND209-52 See the responses to comments CM1-141 and CO11-4.

IND209-53 We have determined that maintenance and inspection operations at the M&R facility would result in the release of 2.17 tons of methane once every 7 years. These releases would be minor and are not expected to impair air quality.

IND209-54 See the responses to comments CM1-12 and IND1-1.

IND209-55 Section 4.11.2 of the EIS has been updated to provide an assessment of noise impacts at the garden plots closest to the proposed M&R facility.

IND209-56 The results of our acoustical assessment indicate that noise attributable to operation of the M&R facility should be significantly lower than a day-night sound level of 55 decibels on the A-weighted scale at any nearby noise sensitive area and the change in the noise level would likely be undetectable to the human ear.

IND209-57 The purpose of this section of the EIS is to discuss the reliability and safety of natural gas transmission pipelines and associated facilities.

IND209-58 A pig launcher/receiver would be installed at the M&R facility at Floyd Bennett Field, which is part of the GNRA. A pig launcher/receiver would be installed at the tie-in between the existing Lower New York Bay Lateral and proposed Rockaway Delivery Lateral, which would be located offshore outside of the GNRA.

IND209-59 Table 4.12.2-3 of the EIS has been updated to provide data through 2012.

IND209-60 We added Table 4.12.2-4 to the EIS to provide data on unintentional offshore leaks per 1,000 miles of pipeline on Transco's system. Section 4.12.3 of the EIS has been updated to clarify that Transco uses both automatic rupture-detection and remote-controlled shut-off valves.

IND209 – Joseph Nerone (cont'd)

IND209-61	51. Page 4-177 Additional Safety and Security Issues. perhaps this is a good section of the DEIS to discuss the 112 crash bollards with night time lights in the Historic Hangar row.
IND209-62	52. Page 4-179 Cumulative Impacts. The Liberty Port Ambrose LNG Project's cumulative impact needs more consideration in this section. See above complaints #1 Port Ambrose Project necessary for Rockaway Project; #10 distortion of Port Ambrose Project by the FERC; #11 overbuilding/local distribution company concern; #22,23,24 marine mammal environment; #26 noise on marine environment; #28 biocides; #29 threatened wildlife; #32 vessel traffic; #44 small gain/large impact; #47-50 safety, and Appendix N of the DEIS supports my claims.
IND209-63	53. Page 4-182, Table 4.13-2. See above complaint # 52. The FERC/EIS-0246D Conclusions and Recommendations. To avoid being redundant I will address the greatest concerns in this section of the DEIS.
IND209-64	54. Page 5-1 It took Transco 6 months to commit to active backfill, unnecessarily delaying the Projects. It also took Transco 1 year to commit to a pipeline burial depth of 4 feet, unnecessarily delaying the Projects. For transco to now insist they need to meet a Nov. 2014 in-serviceword deadline is a lie.
IND209-65	55. Page 5-7 The water-based drilling fluid can not be described as "non-toxic".
IND209-66	56. Page 5-8 Pile installation will take up to 20 days, see complaint # 26.
IND209-67	57. Page 5-13 The appearance will be altered by the @ 112 illuminated crash bollards, see complaint #51.
IND209-68	58. Page 5-16 Determination of Effect will not be determined until after the FERC authorizes the Rockaway Project. This is problematic!
IND209-69	59. Page 5-17 I take exception to the noise levels attributable to the M & R facility.
IND209-70	60. Page 5-19 Alternatives Considered. The modifications to create a new connection on the Rockaway Peninsula would have significantly less environmental impacts than the proposed Rockaway Project. The Rockaway Project does not guarantee the local distribution company will not build a new gas main from Long Beach through the Rockaway Peninsula anyway.
IND209-71	61. Appendix B New York City Mayors Negative Declaration. Does not describe a need for more natural gas.
IND209-72	62. Page B-546 Statements made are not true. The proposed project would physically impact portions of the S/NR-listed Floyd Bennett Historic District. The National Grid Project would intrude upon the historic hangars because they will own some equipment, have pig launchers and etc. in the hangars.

(10)

IND209-61	The crash bollards which would be installed at the M&R facility are discussed in Section 4.10.1 of the EIS.
IND209-62	See the response to comment IND43-1.
IND209-63	See the response to comment IND43-1.
IND209-64	Comment noted. The Commission is not bound to issue a decision on the Projects by any given date.
IND209-65	See the response to comment IND209-29.
IND209-66	See the response to comment IND209-36.
IND209-67	Comment noted.
IND209-68	See the response to comment IND104-9.
IND209-69	Comment noted.
IND209-70	We evaluated the potential to service National Grid's market areas in Brooklyn and Queens by increasing supplies through Transco's existing Long Beach connection. We determined that this alternative would require installing approximately 14.1 miles of new pipeline through the streets of Nassau and Queens Counties, modifying and expanding the existing Long Beach M&R Facility, and constructing 2.1 miles of new pipeline between the towns of Lynbrook and Hewlett, New York. While this alternative would minimize offshore impacts, it would require many more miles of pipeline and cross more densely populated areas than the proposed Rockaway Delivery Lateral. See Section 3.3.9 of the EIS.
IND209-71	Comment noted.
IND209-72	Comment noted.

IND209 – Joseph Nerone (cont'd)

IND209-73 Appendix I, Table 2-3 shows the sediment sample with elevated Mercury.

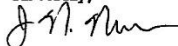
IND209-74 Appendix N, Request for Incidental Harassment Authorization, page 6-243.
Navy OPAREA map clearly shows the Port Ambrose LNG Project in the vicinity of the Rockaway Project supporting my arguments of the same resource groups suffering from cumulative impacts.

IND209-75 In summary of the DEIS we have insufficient data on a proposed project from a company that omitted critical information from it's application while asking for a fast track in it's application process (shortened rules 801 & 802). Transco further delayed the certification process by arguing with the USACE for a year over the burial depth of the pipeline. Transco then changes the construction schedule to dates that will impact the highest number of park users and simultaneously the public is given a useless DEIS (because the data is based on the coldest ocean instead of the warmest ocean temperatures).

The above statements are true to my knowledge and I fully support statements made by Barbara Pearson and Joe Bonserio, Gay Snyder, and Karen Orlando. I am a registered intervenor in the above proceedings with Karen Orlando.

I thank you for your time and I look forward to your responses to my concerns.

Sincerely,



Joseph N. Nerone

IND209-73 See the response to comment CM1-85.

IND209-74 See the response to comment IND43-1.

IND209-75 See the responses to comments CM1-14 and CM1-122.

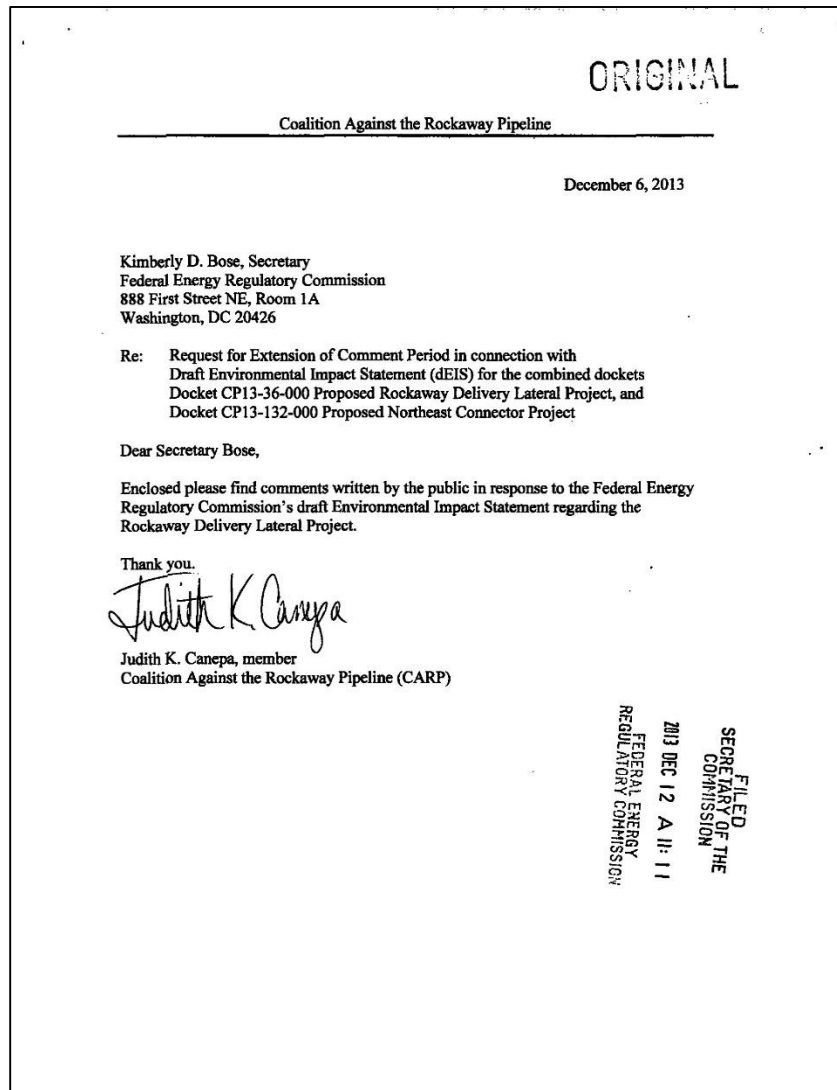
IND210 – Jennifer Miranda-Gumbs

ORIGINAL	
Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street NE, Room 1A Washington, DC 20426	FILED SECRETARY OF THE COMMISSION 2013 DEC 12 A 11: 08 FEDERAL ENERGY REGULATORY COMMISSION
CC: NYC Mayor-Elect Bill de Blasio	
RE: Comments for combined FERC dockets CP13-36-000 and CP13-132-000 Letter in Opposition to the Rockaway Lateral Delivery Project, and Petition to oppose the Rockaway pipeline	
Dear Secretary Bose:	
IND210-1	Please don't bring toxic gas to our beautiful beach. Sandy has caused enough damage.
Respectfully, Jennifer Miranda-Gumbs 312 Beach 66 th Street apt 2 Box 8 Arverne, New York 11692 Email: jenda44@gmail.com Date: December 6, 2013	

IND210-1

Your opposition to the Rockaway Project is noted.

IND211 – Judith Canepa et al.



IND211 – Judith Canepa et al. (cont'd)

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

December 4, 2013

CC: NYC Mayor-Elect Bill de Blasio

RE: Comments for combined FERC dockets CP13-36-000 and CP13-132-000
Letter in Opposition to the Rockaway Lateral Delivery Project, and
Petition to oppose the Rockaway pipeline

Dear Secretary Bose:

IND211-1 | A few of our concerns:
- Williams Transco intends to construct the pipeline this summer at Riis Park
- The pipeline (including the regulator valve) is in a flood zone
- The company has a dismal safety record
- The equipment will be controlled remotely from Texas

Respectfully,

Adam Neaman
Email: aneaman@yahoo.com
504 East 63rd Street, #22L
City: New York, New York 10065

IND211-1

Your opposition to construction of the Rockaway Project in summer is noted. See the response to comment CM1-50. Pipeline safety, including Transco's incident history, is discussed in Section 4.12 of the EIS.

IND211 – Judith Canepa et al. (cont'd)

From: Nancy Black
110 Livingston Street, 11D
Brooklyn, New York 11201
December 4, 2013

To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

CC: NYC Mayor-Elect Bill de Blasio

RE: Comments for combined FERC dockets CP13-36-000 and CP13-132-000
Letter in Opposition to the Rockaway Lateral Delivery Project, and
Petition to oppose the Rockaway pipeline

Dear Secretary Bose:

IND211-2 Stop the Rockaway Pipeline, which will increase the possibility of
fracking in NYS and threaten the fragile wetlands of the Gateway
National Recreation Area.

Respectfully,

Nancy Black
(address above)

Email: nbb@westnet.com

IND211-2

See the response to comment CM1-6. The Projects do not involve hydraulic fracturing. The Rockaway Project would not result in any impacts on wetlands because the pipeline would be installed beneath the shoreline using the HDD construction method.

IND211 – Judith Canepa et al. (cont'd)

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

December 4, 2013

CC: NYC Mayor-Elect Bill de Blasio

RE: Comments for combined FERC dockets CP13-36-000 and CP13-132-000
Letter in Opposition to the Rockaway Lateral Delivery Project, and
Petition to oppose the Rockaway pipeline

Dear Secretary Bose:

IND211-3 | This pipeline is dangerous and unnecessary. The Rockaways lie in a flood zone, which makes this project extremely risky. Furthermore, the company has a terrible safety record.

Sincerely,

Amy Stuart
452 3rd Ave
Brooklyn, NY 11215
Email: amys29@gmail.com

IND211-3

Your opposition to the Rockaway Project is noted. Pipeline safety, including Transco's incident history, is discussed in Section 4.12 of the EIS. See the response to comment CM1-8.

IND211 – Judith Canepa et al. (cont'd)

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

December 1, 2013

CC: NYC Mayor-Elect Bill de Blasio

RE: Comments for combined FERC dockets CP13-36-000 and CP13-132-000
Letter in Opposition to the Rockaway Lateral Delivery Project, and
Petition to oppose the Rockaway pipeline

Dear Secretary Bose:

IND211-4 | Please don't put a gas pipeline for frackng under the Rockaways. Thank you.

Sincerely,

Sharon Simpson
253 W 91st Street
New York, NY 10024

Email: ssimpson@sjspjrojects.com

IND211-4

Your opposition to the Rockaway Project is noted. The Projects do not involve hydraulic fracturing.

IND211 – Judith Canepa et al. (cont'd)

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

December 1, 2013

CC: NYC Mayor-Elect Bill de Blasio

RE: Comments for combined FERC dockets CP13-36-000 and CP13-132-000
Letter in Opposition to the Rockaway Lateral Delivery Project, and
Petition to oppose the Rockaway pipeline

Dear Secretary Bose:

IND211-5 | Please keep your damned pipeline away from us!

Kevin Kash
Email: dtllamf@aol.com
160 beach 117th street,
Rockaway Park, New York 11694

IND211-5 Your opposition to the Rockaway Project is noted.

IND211 – Judith Canepa et al. (cont'd)

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

CC: NYC Mayor-Elect Bill de Blasio

RE: Comments for combined FERC dockets CP13-36-000 and CP13-132-000
Letter in Opposition to the Rockaway Lateral Delivery Project, and
Petition to oppose the Rockaway pipeline

Dear Secretary Bose:

Laurel Leiter
107-10 Shore Front Pkwy
Rockaway Park, New York 11694

Email: laurellejean@gmail.com

Date: 2013-12-05

IND211 – Judith Canepa et al. (cont'd)

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

CC: NYC Mayor-Elect Bill de Blasio

November 25, 2013

RE: Comments for combined FERC dockets CP13-36-000 and CP13-132-000
Letter in Opposition to the Rockaway Lateral Delivery Project, and
Petition to oppose the Rockaway pipeline

Dear Secretary Bose:

This is how I see it:

IND211-6] THE BAIT. The Rockaway Lateral Delivery Project had been in the planning for years. All along--in discussions with FERC and city, state and other federal agencies--Williams Transco had said the work would be done during winter, when marine populations are low and no one is at the beach. The sampling was done during winter months, and FERC's draft Environmental Impact Statement (dEIS) is based on a winter construction schedule. In many areas of concern, the promised winter construction was considered the primary mitigation.

THE SWITCH. Two weeks after FERC published its dEIS, pipeline company Williams Transco makes a stunning announcement: it intends to build the pipeline this summer. Williams Transco is re-designing this project AFTER publication of the draft EIS! Throughout the current FERC comment period, Williams Transco has been releasing new information (over 1000 pages of new documentation to date), and their consultant Ecology & Environment, Inc. recently informed the NYS Department of State that "Transco's evaluation of the revised schedule and changes to the proposed action have been ongoing and will continue..."
[FERC-library, Docket CP13-36, document 20131018-5181(28841312)]

IND211-7] SOME FACTS ABOUT THIS CONSTRUCTION. To lay the pipeline, Transco will:
1. conduct horizontal directional drilling under Riis Beach and deposit the remains of that process (sand, perhaps long-buried land-fill toxins, and certainly the toxic chemicals that will be used during the process) on the ocean floor a half-mile offshore of the bathing area of a popular public beach,
2. lay open the ocean floor off Riis Beach, stirring up sediment (again, lots of sand and very likely long-buried toxins along with it, will be released into the water column) over a two-mile stretch that begins a half-mile offshore of Riis,

IND211-8] 3. NOT STOP OPERATIONS ONCE BEGUN, NOT EVEN OVER JULY 4th WEEKEND!

IND211-6 See the responses to comments CM1-14 and IND1-1.

IND211-7 Comment noted. See the response to comment CM1-85.

IND211-8 Comment noted. See the response to comment CM1-85.

IND211 – Judith Canepa et al. (cont'd)

[See notes of a conference call among representatives of Williams (Transco), the pipeline company's consultant E&E, and NYS Department of State. This can be found among post-dEIS filings. FERC-library, Docket CP13-36, document 20131018-5181(28841312), page 5 of the 83-page FERC-generated pdf, Meeting Summary, September 17, 2013.]

IND211-9 FERC MUST WRITE A SUPPLEMENTARY EIS.

Since Transco's summer construction would impact all in ways not studied in the current draft EIS, the impacts to marine biology, commercial and recreational fishing, and ocean bathers must all be studied anew in light of this radical change in schedule.

IND211-10 ALL STAKEHOLDERS MUST BE NOTIFIED AND ALLOWED TIME TO COMMENT.
All within a 5-mile radius of this project should be given clear notice of this proposed Rockaway Lateral Delivery Process and the impacts of its construction during summer. All should be allowed sufficient time to understand the situation and comment to FERC.

Thank you for your time and attention to this matter.

Yours truly,

Maureen Healy
1175 73rd Street
Brooklyn, NY 11238
Email: mhealy1234@aol.com

November 25, 2013

IND211-9 See the responses to comments CM1-14 and CM1-122.

IND211-10 See the response to comment CM1-1.

IND211 – Judith Canepa et al. (cont'd)

To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Comments on draft EIS for combined FERC dockets CP13-36-000 and CP13-132-000
(Letter in Opposition to the Rockaway Lateral Delivery Project)

FEDERAL ENERGY
REGULATORY COMMISSION

Dear Secretary Bose:

I write to communicate my opposition to the Rockaway Lateral Delivery Project, a high-pressure gas pipeline proposed by Transcontinental Gas Pipeline Company, LLC ("Transco" or Williams Transco) to be sited at the Rockaway shore primarily within Gateway National Recreation Area, Federal parkland. I understand the proposed path has the pipeline trenched into the ocean floor, running under the sand of Jacob Riis Beach, crossing under the Rockaway Inlet alongside Jamaica Bay, continuing north next to Flatbush Avenue and into a Metering & Regulating facility (M&R Station) to be built in two historic hangars at Floyd Bennett Field.

I ask you to recognize the potential harmful and unwanted impacts of the Rockaway Pipeline.

IND211-11

Hurricane Sandy proved to us how vulnerable our shoreline is. We can not afford the risks inherent in bringing this pipeline through our recreation area, past our homes and habitats.

IND211-11

Your opposition to the Rockaway Project is noted.

IND211-12

Now is the time to invest in renewable energy. Rockaway does not want this.

IND211-12

Renewable energy alternatives are discussed in Section 3.2.2 of the EIS.

I urge the Federal Energy Regulatory Commission to refuse the requested but unwarranted Certificate of Public Convenience and Necessity, and thus halt the construction of the Rockaway Lateral Delivery Project.

Thank you.

Respectfully,

Signature Kalin Callaghan Printed Name Kalin Callaghan
Address 8000 Shore Front Pkwy Apt 5V Date 12/3/13
Rockaway Beach NY 11693

IND211 – Judith Canepa et al. (cont'd)

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IND212 – Karen Orlando

Public Notice/Adaptive Use of Hangars/NPS policy and law

12/13/2013

Ms. Bose,

IND212-1 I am submitting a link to a letter published in the Canarsie Courier where the National Park Service was asked for a public forum on policy issues surrounding their decision to lease historic hangars in this park to Williams and National Grid as part of the Rockaway Lateral project as part of the public record in this docket. I am also sending a copy of one email that was sent to the former superintendent of Gateway National Recreation Area where dedicated NPS civic engagement policy department was copied also asking for a public forum. Neither or these requests were answered.

http://www.canarsiecourier.com/news/2013-04-11/Letters%7COpinion/An_Upcoming_Project_Thats_NOT_A_Gas.html

"Hello Linda,

I would like to know at this point how Gateway can fulfill the National Park's Service commitment to civic engagement in regards to HR2606 and the placing of a metering and regulating facility in historic hangars in Floyd Bennett Field and have some questions I'd like answered.

1. Will any public meetings be held by the park service where citizens and park users concerns about the introduction of industrial use in Floyd Bennett Field be addressed?
2. Once this bill is passed and signed by the president does the GNRA unit have any discretionary decision making power at their disposal in deciding whether or not to place this facility in the park or has the decision already been made by Congress with the help of those in the National Park Service who testified in support of the bill and placing industrial facilities in Floyd Bennett Field?
3. At what point, if any, did or does the National Park Service plan on involving citizens and park users in the decision to allow the building and operation of the metering and regulating facility in Floyd Bennett Field? Does the National Park Service have any responsibility to include the public or repond to the public on this matter?
4. Do you know why IIR 2606 and the plans for introducing the metering and regulating facility into the park were not included in Gateways recent GMP public outreach?
5. Do you know why the National Park Service testified in support of the plan to introduce the metering and regulating station into the field in the House based on just

IND212-1

Comment noted.

IND212 – Karen Orlando (cont'd)

IND212-1
(cont'd)

an early draft from Williams and not after even a draft environmental impact statement was produced by Williams or after all the necessary permits and approvals which are required as part of the FERC process were given? (FERC's notice to the public about the draft EIS scoping period implied that congressional authorization by Congress and necessary permits by the National Park Service would come after FERC's approval and all necessary permits needed as part of that process were given.)

6. Can the National Park Service tell the public at what point the decision was made to place the metering and regulating station in historic hangars at Floyd Bennett Field and at what level in the park service that decision was made?

7. Can the National Park Service explain how the decision was made, what criteria were looked at in the decision to place the facility in the park?

8. Could any of these questions be answered as well in regards to the right of way under Jacob Riis Beach and public concern, questions or input about that?

9. Can you provide any information about public input at any point thus far or what role the National Park Service believes park users can have or should have?

10. Can we discuss setting up a public forum where some of the answers to these questions will be addressed by the National Park Service? Preferably before HR2606 is signed, which could happen as early as the end of next month?

I am a park user who has been identified as a stakeholder by Williams in the plans for this project and for the M&R facility in Floyd Bennett Field.

Thanks,

Karen Orlando"

IND213 – Karen Orlando

Supplemental Information Provided to assist FERC in determining that Liberty Natural Gas LLC's proposed Port Ambrose Project is a connected, supplemental project reliant on the Rockaway Lateral expansion and NPS policy correspondence by intervenors

12/13/2013

Ms. Bose,

IND213-1 I am submitting the following documents under docket CP13-36 as they relate to questions of policy and section 106/NEPA review for the Rockaway Lateral Delivery Project action, specifically adaptive reuse of the hangars for the purpose of housing a metering station and the connected action of the Port Ambrose deepwater port project. FERC has been asked to consider that Port Ambrose is a connected action and/or supplemental project.

1. A document with examples of letters to NPS and a published letter in the Canarsie Courier asking for public forums on questions of NPS policy and decision making process as it relates to this docket.
2. A document that is part of Liberty Natural Gas LLC's amended application submitted into the public record on that project in Feb. 2012 and dated Nov. 2011. In this document it is stated that Liberty Natural Gas LLC desires to tap into the existing Transco NYLBL. In Section 21.7 of this document under the heading "33 CFR 148. 105 (t) (7) **Information on Pipeline Connecting to the Port**" Liberty made the following statement: " Liberty's 26-inch mainline will connect offshore to Transco's 26-inch OD Lower New York Bay Lateral which extends from Morgan, New Jersey to Long Beach, NY. Additional information on the Transco line, **including throughput** and capacity rates will be provided to USCG and MarAD (confidentially) **in coordination with Transco.**"
3. The cover letter of Liberty's revised application where it is stated that an integral part of Liberty's project is the tie-in to the NYLBL. Further documents may be found here: <http://www.regulations.gov/#/documentDetail;D=USCG-2010-0993-0111>
4. A letter previously submitted to FERC which states Liberty Natural Gas LLC had "intent to designate the alternative site" from this "amended application", which is either the current site or close enough to be essentially the same location of Liberty Natural Gas LLC's Port Ambrose project with the tie-in to the NYLBL, dated Feb 23, 2012. At the time Liberty stated they had launched accelerated **studies at the current site in Nov. 2011 that concluded in Feb 2012.**
5. An image taken from this application which shows both the ultimately unworkable Port Site as well as the "alternative" site which to my knowledge is basically where the project is currently proposed to be located as of Sept. 2012 and specifically the two tie-in locations to the LNYBL.
6. Liberty's current application to USCG and MarAd, which predates the Transco 7C application under docket CP13-36 by three months is available here: <http://www.regulations.gov/#/docketDetail;D=USCG-2013-0363>

Thanks,
Karen Orlando

IND213-1

Comment noted. See the responses to comments CM1-34, CM1-43, and IND43-1.

IND213 – Karen Orlando (cont'd)

I am certifying that all on the service list have received these documents.

IND213 – Karen Orlando (cont'd)

The attachments to this letter are too voluminous to include in this EIS. They are available for viewing on the FERC website at <http://www.ferc.gov>. Using the "eLibrary" link, select "General Search" from the eLibrary menu, enter the selected date range and "Docket No." excluding the last three digits (i.e., CP13-36, CP13-132, PF09-8), and follow the instructions. For assistance please contact FERC Online Support at FERCOnlineSupport@ferc.gov or toll free at 1-866-208-3676, or for TTY, contact 202-502-8659. The Category/Accession number for this submittal is 20131213-5270.

IND214 – Karen Orlando

12/18/2013

Supplemental information: Request Clarification of Dates from National Grid's BQI project and clarification on M&R throughput capacity of Long Beach Meter Station/Port Ambrose connected action

Ms. Bose,

- IND214-1
- 1.) Could National Grid confirm that the BQI EA filing has documents submitted to Army Corps and NYS DOS that date back to either 2007 or 2008 and the construction of a 12 inch and 26 inch pipe as part of that project? <http://www.scribd.com/doc/110071924/brooklyn-queens-interconnect-environmental-assessment-statement> Appendix 1. Natural Resources @ page 152/153
 - 2.) Could Transco or National Grid confirm whether or not the current throughput of the M&R in Long Beach is around 530 million cubic square feet per day as stated in documents submitted as part of Atlantic Sea Harbor's formerly proposed LNG project? Atlantic is the company under docket PF09-8 that stated that Transco was providing misleading and non-factual information in their 2009 pre-file resource reports. <http://www.regulations.gov/#IdocumentDetail;D=USCG-2007-28535-0147> (page 3)
 - 3.) Could Transco confirm whether the throughput of the M&R in Long Beach mentioned above is the current throughput following the Leidy to Long Island expansion (docket CP06-34), which involved an uprate in MAOP of the existing Transco NYLBL from 800 to 960 psi, pipeline looping upstream and meter station changes at the Long Beach M&R for the purpose of delivering an additional 100 million cubic square feet of gas per day as stated in the EA on that project?
 - 4.) Could Transco confirm that at the time of their original pre-filing document under docket PF09-8 there was an LNG project proposed offshore that desired to tap into the existing Transco Lateral that pre-dated their entry into pre-file?
 - 5.) Could Transco confirm that at the time of their 7C application under docket CP13-36 in January 2013 there was also an LNG project proposed offshore that desired to tap into the existing Transco Lateral that pre-dated their filing, that even in an earlier version of this project from late 2011/early 2012 this tap-in was an integral part of that LNG project and still is?
 - 6.) Would Transco or FERC like to explain what is going on under this docket and what occurred during docket PF09-8?
 - 7.) FERC has been asked numerous times to consider that Port Ambrose is a connected project that is reliant on the Rockaway Lateral Project.
 - 8.) What is the purpose of the Rockaway Lateral Project?

Thanks,

Karen Orlando

I am certifying that all on the docket service list received this document.

IND214-1

See the response to comment CM1-43.

IND215 – Barbara Pearson

December 19, 2013

Ms. Bose:

IND215-1 Based on comments I have been reading, it seems you have grounds to include the non-jurisdictional Port Ambrose project's impacts in this docket.

Consider:

1. National Grid's BQI documents dating back to 2007, and
2. the existence of Atlantic Sea Island's LNG project prior to Transco's pre-file docket PF09-8 which needed a tie-in to Transco's LNYBL, and
3. Atlantic Sea Island's statements that they most definitely did discuss with Transco at length tying in to their LNYBL, and
4. concurrent with Transco's 7(c) application, the Liberty Natural Gas Port Ambrose project needing a tie-in to the LNYBL, and
5. As a result of Rockaway Lateral, there will be unused capacity in LNYBL that can be taken up by Port Ambrose if that project goes forward

There is a clear link from Transco's Rockaway Lateral to Liberty's Port Ambrose. For the entire life of the Rockaway Lateral project there has been the ability to accommodate some LNG project by freeing up the LNYBL. And for most of the Rockaway Lateral project's existence, there has been an LNG project standing by with a need to tie into that freed up capacity. I would therefore argue that the Rockaway Lateral's configuration was very much a product of these factors and was configured specifically to provide access to Transco's LNYBL to an LNG port.

And so, based on this, Port Ambrose satisfies this requirement of FERC's four point test for non-jurisdictional facilities:

- *Whether there are aspects of the nonjurisdictional facility in the immediate vicinity of the regulated activity which uniquely determine the location and configuration of the regulated activity.*

Today it's Liberty, yesterday it was ASIG, tomorrow it could be some other company - it doesn't matter. What matters is that there has consistently been the need and desire to give an LNG port access to Transco's LNYBL and so the Rockaway Lateral's configuration was uniquely determined by this need for a tie-in to LNYBL by an LNG port.

Port Ambrose is an "integrally-related non-jurisdictional project".

Barbara Pearson

I certify that all persons on the service list in this docket have been sent a copy of this document

IND215-1

See the response to comment CM1-43.

IND216 – Karen Orlando

12/20/2013

Response to Transco's Dec 20, 2013 submittal and Port Ambrose connected project

Ms. Bose,

- 1.) As part of Williams recent response, specifically what is quoted below and **TABLE 3.5-1 on page 49**, which **finally lists all of the alternatives** that were selected and considered for the M&R, I would like to offer a response:

IND216-1 "From 2009 through submittal of the FERC (7c) Application (Application) on January 7, 2013, additional analyses were conducted to prepare the Application including evaluation of wetland impacts, adjacent land use, long-term visual impacts, and lease and/or purchase potential for the parcel needed for the M&R facility. **Since that time, the hangar location in Floyd Bennett Field was identified as a more suitable option and has been consistently listed as the preferred site, starting with revised draft RR1 and RR10 submitted in March 2012.**"

Response: Transco provided Resource Reports 1 & 10 where the preferred metering station's location in historic hangars in Floyd Bennett Field is listed **for the first time in March 2012**. Prior to that date there was no Resource Report 1 or 10 where these historic hangars were even mentioned as an alternative site. These resource reports were submitted into FERC under prefile PF09-8 docket after all testimony in Congress on HR2606 by the National Park Service had already occurred and before Transco had public meetings on this project to even "introduce" the public to the project as part of the pre-file "planning process". This was also prior to public scoping. Perhaps Transco should explain what the purpose of pre-file is. These resource reports were also submitted after the Mayor's Negative Declaration on the National Grid BQI project was released and that project seems to assume that the hangars most assuredly will be the site of the metering station as well.

IND216-1

Comment noted. Our analysis of alternative M&R facility sites is provided in Section 3.5 of the EIS. Land use impacts are discussed in Section 4.8 of the EIS. Visual impacts are discussed in Section 4.8.8 of the EIS. See the response to comment CM1-34.

IND216 – Karen Orlando (cont'd)

IND216-1
(cont.)

As stated in Transco's resource reports and in their responses in this Dec.20 2013 response (number 8 on page 28) Transco cannot speak for the National Park Service. Also Transco worked with the National Park Service and local politicians to introduce HR2606 into Congress before public meetings and before public scoping on the project. When Transco states that "prior to approval...the Project will be reviewed for consistency with NPS management policies and requirements of NEPA" however they appear to be speaking for NPS who don't seem to have been reviewing this project at any step so far for consistency with their management policies. Intervenors, citizens and park users have also stated to FERC that NPS appears to have management policies they have already violated.

I would like to remind FERC that from their first interaction with citizens knowledgeable about and familiar with Floyd Bennett Field, they heard and have heard many times since that 1.) the public including the surrounding communities had been asked for input about what kinds of future use would be appropriate for this park at exactly the time period that NPS began considering the placement of the M&R in these hangars and keeping that information from the public; 2.) The National Park Service at no time during the Floyd Bennett Blue Ribbon planning process nor their GMP planning outreach ever suggested that a use like the M&R as part of this project was being considered as a "park improvement". Even a local community board in Brooklyn, community board 18 has been reported on by local news sources as considering the siting of the M&R in the hangars as inappropriate. "Deal breaker" was their term.

"Adjacent land use" appears only to be a factor when it relates to the Marine Park Golf course, the view from vehicles on Flatbush Ave near the Beltparkway which I had no idea was a prized view, or a parking lot used by NYCDOT and a Belt parkway onramp as in alternative 3. When it comes to Floyd Bennett Field, "adjacent" land use is a moot concept as the facility is currently proposed to be built in the park not "adjacent" to it. The fact that the area in the park "adjacent" to the hangars itself was even actively used by citizens for recreational and educational uses in the park or that there are any future plans for appropriate park uses by the public at all appears to be an afterthought.

IND216 – Karen Orlando (cont'd)

IND216-1
(cont.)

Compare the preferred location then to alternative 3 which is described in the data on page 49 for construction even as **50 feet from the Golf Course** and **not in the golf course**, or right on the greens of hole 8 for instance. Perhaps Transco can come up with as snappy a response as to what the difference is in the entrance fee to users of the Golf Course and Gateway NRA as they did to Ms. Snyder about what the difference might be for what an appropriate adaptive use for historic property in NPS like at Fort Hancock might be and Floyd Bennett Field?

IND216-2

2.) In response #11 on page 47, Transco has come up with some very interesting answers about the viability of this location which previously had been described as Transco's original preferred site for their M&R. The concerns about this location, as stated in documents submitted by Transco in 2009, was that it might conflict with "plans for the development of a mall." It has now been described in the chart on page 49, labeled as alternative 6, as both owned by NYCEDC and as parkland as well. However the information about the site being parkland is entirely absent from Transco's long winded response on the previous page, their #11 response and conflicts with their description of the site in their 2009 Resource Reports. In November 2009, under docket PF09-8 Transco said this about "alternative 6" their formerly preferred site for the M&R: "Stakeholder outreach efforts in the past month have again focused on working with the City of New York regarding the parameters required for securing and co-existing with a potential retail development on the proposed meter station site. National Grid and Transco participated in a joint meeting with the local Brooklyn delegation including State Senator Carl Kruger, State Senator John Sampson, City Councilman Lewis Fidler, State Assemblyman Alan Maisel and" (As a point of reference to FERC and Transco on NY politicians, former State Senator Kruger is currently in prison and Mr. Sampson has also I believe been indicted on charges.) By spring 2010 Transco reported that they were continuing their efforts to identify an acceptable site for their proposed meter station as "Transco has determined that the original preferred site on land owned by the NYC Economic Development Corporation is no longer an option." Was the site rejected for the reasons Transco has now stated in their Dec. 20, 2013 response or because it conflicted with plans for a mall?

IND216-2

See the response to comment IND177-5.

IND216 – Karen Orlando (cont'd)

3.) On page 27 "Transco acknowledges that upstream alterations are required to supply an incremental (additional) 100 Mdth/d of natural gas to National Grid's system in the Brooklyn/Queens service area, e.g., as part of the Northeast Connector Project"

IND216-3 Finally Transco acknowledges that the Rockaway Lateral Project alone was not capable of supplying incremental supply of gas to National Grid. They have done so well past public scoping on this project and after their 7C application was filed which stated they had no knowledge of any projects that needed to be filed. They have done so after HR2606 which was called the "New York city gas supply enhancement act" was passed. Perhaps the bill should have been called the NYC "pipeline capacity" Enhancement Act through Gateway National Recreation Area?

I would like to remind FERC that as soon as FERC included the Northeast Connector as a connected project under docket CP13-36 in spring 2013, Transco was asked to simply verify and make clear what the total incremental supply of the Rockaway Lateral and Northeast Connector projects was by an intervenor and interested citizen under both docket CP13-36 and docket CP13-132. Transco refused to answer that simple question. I would also like to remind FERC that their notice to the public on scoping for the Rockaway Project also stated that according to Transco new incremental gas supply, specifically 100 Mdth/d would be supplied once the Project, which at that time was only the Rockaway Lateral, was constructed.

IND216-4 4.) In Table 1, Summary of Rockaway Delivery Project correspondence with NYOPHRP, in late 2011 while the public was largely unaware of both HR2606 and this project, HSR information was already submitted to agencies that need to weigh in on this project and the use and rehabilitation of the hangars for the purpose of housing the M&R. When did public input on Section 106 begin?

IND216-5 There is also a project being considered under a different federal review by USCG and MarAd, the Port Ambrose deepwater port project which appears, according to

IND216-3

As described in Section 1.1 of the EIS, the Projects would provide firm delivery lateral service of 647 Mdth/d of natural gas to National Grid's distribution system, of which 100 Mdth/d would be incremental (i.e., additional) supply. Also see the response to comment IND1-1.

IND216-4

The Section 106 review process for the Projects is discussed in Section 4.10 of the EIS.

IND216-5

See the responses to comments CM1-43 and IND43-2.

IND216 – Karen Orlando (cont'd)

IND216-5
(cont.)

information supplied by both FERC and the applicant under this docket and in the draft EIS to be reliant on the Rockaway Lateral Project being approved and constructed. Both Liberty Natural Gas LLC and Transco appear to be misleading either Federal agencies and the public or just the public and news sources about the "connection" between their projects. Liberty's project can either move forward without the Rockaway Lateral project, with their tie-in to the existing NYLBL as an integral component, or it cannot and would likely need to be substantially altered. Intervenor under this docket have been asking about the possible and what appeared to us to be a fairly obvious "connection" between the Rockaway Lateral expansion and the proposed deepwater port for a long time, much of 2013 in fact prior to FERC's release of the draft EIS on the Rockaway Lateral and Northeast Connector in fact. Liberty's project not only relies on a tie-in to the NYLBL as an integral component of their project's siting, their application to USCG and MarAd pre-dates Transco's application under docket CP13-36. Maybe next year sometime Transco will "acknowledge" that Liberty's project can only make "optimal use" of their existing NYLBL if the Rockaway Project is built! If Liberty can deliver an average of 400 MMcf/d into the existing infrastructure to the M&R in Long Island, how come Transco could not deliver 100 MMcf/d without altering their own infrastructure and the M&R in Long Beach?

Karen Orlando

I am certifying that all on the service list have received this document.

IND217 – Barbara Pearson

December 20, 2013

Ms. Bose

IND217-1 | Transco's answer to FERC's data request #11 contains inaccurate information. In table 3.5-1, under Alternative 6, the answer given to item #4 "Requires new building on park land (NPS or New York City)" is incorrect. This is not park land and so the answer should be "NO."

Thank you.

Barbara Pearson

I certify that all on the service list have been sent a copy of this document.

IND217-1

Comment noted.

IND218 – Nicholas Lynn

20131224-5021 FERC PDF (Unofficial) 12/24/2013 8:52:54 AM

Nicholas Lynn, New York, NY.
Dear Sirs,

IND218-1 I understand comments were to be taken by 12/9, however, I'm hopeful this comment will be included.

I am firmly against the proposed Rockaway LNG pipeline. We do not need, nor want, this kind of energy infrastructure investment – the impact on our environment is not worth the benefit. LNG is not the future for this country, and the price we will pay, environmentally, is far greater than any short-term alleged financial boon we might see from accelerated natural gas development. Please do not allow this project to move forward.

As a lifelong resident of the northeast (specifically, NYC), I have spent an enormous amount of time on our local beaches. I have seen, and experienced, firsthand, the beauty, and the destructive force of nature here (my family lost a house to the Perfect Storm in the 90s). To me, a project that disrupts & threatens local wildlife, puts toxic infrastructure and commerce in harm's way via hurricane alley, and furthers our dependence on fossil fuels cannot be considered a responsible move by society. I urge you to stop this, for the sake of our collective futures.

Thanks,
Nick Lynn

IND218-1

Your opposition to the Rockaway Project is noted. The Rockaway Project would not transport LNG. Impacts on wildlife are discussed in Sections 4.5, 4.6, and 4.7 of the EIS. See the response to comment CM1-8.

IND219 – Gay Snyder

20131226-5003 FERC PDF (Unofficial) 12/25/2013 5:02:17 AM

Response to Transco's December 20, 2013 Submittal

Gay H. Snyder
Attorney at Law
2920 Avenue R #250
Brooklyn, New York 11229
Phone: (718) 339-5491
Fax: (718) 339-5417

December 25, 2013

Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426
Attention: Ms. Kimberly D. Bose, Secretary

Re: Transcontinental Gas Pipe Line Company, LLC Rockaway Delivery
Lateral Project
FERC Docket: CP 13-36-000

Dear Secretary Bose:

In response to Transco's recent submittal, I hereby incorporate by reference all opposing comments, including but not limited to, the comments of Ms. Karen Orlando and the comments of Barbara Pearson.

In addition, there are two points I would like to specifically address: the safety issue and the fact that Transco would now like to do construction during the summer, not the winter.

IND219-1

Addressing the later point first and as has been stated by others during the comment period, the original draft EIS evaluated the environmental impact of construction during the winter months. Transco now requests that it be allowed to do construction during the summer months when environmental conditions will be vastly different. The wildlife in the area, the water conditions and the food supply for wildlife will be different in the summer. In response to my concerns, Transco provides no specifics on these issues.

IND219-1

See the response to comment CM1-14.

IND219 – Gay Snyder (cont'd)

20131226-5003 FERC PDF (Unofficial) 12/25/2013 5:02:17 AM

IND219-1
(cont.)

I ask that FERC make an independent evaluation of these concerns and not merely rely on Transco's vague statements and promises. The public is entitled to a new draft EIS.

IND219-2

Secondly, Transco's recent comments do not adequately address the safety issues I had raised in my letter to the Army Core of Engineers. While Transco mentions that firefighting equipment will be on site such as hand held fire extinguishers and a sprinkler system, this is not adequate. Will the fire extinguishers move by themselves? Will they be controlled remotely? Of course not. Who are the individuals that would handle this equipment? Where will these people be stationed?

In the event of a large fire or explosion, the leaking gas, heat and flames would not be confined to the building. Floyd Bennett Field is a recreational park, not an industrial park. There will likely be dozens, if not hundreds, of park users nearby as well as a marine forest and other greenery. Even if the gas is turned off and the fire self extinguishes **inside** the building, what about the people, animals and greenery **outside** of the building?

Transco's submission does not address my concern that Floyd Bennett Field is located on a narrow peninsular with only one main road: Flatbush Avenue. How will ambulances and fire trucks reach the park and rescue the injured if the road is cut off by smoke and flames or if there is a traffic jam on Flatbush Avenue? Transco ignores this concern. Apparently, there is no good answer.

Councilman Lew Fidler and others wrote to FERC to note that there are few working fire hydrants in Floyd Bennett Field and up Flatbush Avenue. The park consists of acres and acres of marine forest that can become very flammable during dry spells. A fire could burn for hours, spread quickly and consume many acres of land.

Based upon its own literature, the NPS wants to expand and encourage public use of Floyd Bennett Field for recreational activities that could attract hundreds or even thousands of people. In recent years, Floyd Bennett Field has been used for concerts, the Kings County Fair, camping and other events. It is surrounded by a tall fence with, at most, two entrances/exits. Oftentimes, one of the exits is locked and closed! Hence if there were a fire, explosion or gas leak, potentially hundreds or even thousands of people would be trapped in Floyd Bennett Field because Flatbush Avenue would either be blocked and/or it would be very congested with traffic. People trapped in the park would have to run, bicycle or drive to Jamaica Bay on the eastern end of the park and wait for help or jump into the water. The fire department and other rescuers would have great trouble arriving at Floyd Bennett Field down Flatbush Avenue. In sum, the

IND219-2

Comment noted. See the responses to comments CM1-8 and CM2-27.

IND219 – Gay Snyder (cont'd)

20131226-5003 FERC PDF (Unofficial) 12/25/2013 5:02:17 AM

IND219-2
(cont.) | planned location of this pipeline and metering station is unsafe in the event of an emergency. Transco's submission does not adequately address these safety concerns.

For all of the above reasons as well as the additional reasons previously presented, I respectfully ask that you not allow Transco to proceed with this project. I especially ask that the metering station and gas pipes NOT be located within Floyd Bennett Field or Gateway National Park.

Very truly yours,

Gay H. Snyder

Gay H. Snyder

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list [or the restricted service list, if applicable] compiled by the Secretary in this proceeding.

Dated at this 25th day of December 2013.

Gay H. Snyder
Gay H. Snyder
Attorney at Law
2920 Avenue R
Brooklyn, NY 11229
Phone: (718) 339-5491

Gay's Response to Transco's response

IND220 – Karen Orlando

20131226-5002 FERC PDF (Unofficial) 12/26/2013 12:35:02 AM

12/26/2013

Ms. Bose,

IND220-1

Under Liberty Natural Gas LLC's current application before the USCG and MarAd, Liberty Natural Gas LLC has recently stated:

"The Port Ambrose project and the Rockaway Delivery Lateral project are not related in any way. Port Ambrose proposes to connect with the existing Transco Lower New York Bay Lateral ("Transco Lateral") several miles downstream of the area where the Rockaway Lateral will connect and transmit natural gas directly to Brooklyn. **Port Ambrose is designed to deliver gas and directly serve the Long Island area, and its design is based on the current configuration and specifications of the Transco Lateral. Regardless of whether the Rockaway Delivery Lateral project moves forward, Port Ambrose will be constructed and utilize the existing Transco Lateral as currently configured.**"

<http://www.regulations.gov/#!documentDetail;D=USCG-2013-0363-1029> (page 169)

FERC has already stated in the draft EIS on the Rockaway Lateral/Northeast Connector projects that Transco **would both need to uprate their existing 26 inch NYLBL and expand the M&R in Long Beach in order to deliver the 100 million cubic feet of additional supply of natural gas that the Rockaway lateral and Northeast Connector will provide** if instead of the Rockaway lateral being built a Transco/National Grid alternative was built. Since FERC has expertise with pipeline capacity well beyond what USCG and MarAd ordinarily do as this is their area of expertise and since FERC should be aware of what the current capacity is of the existing 26 inch Transco NYLBL, how much gas it supplies and the purpose of the Rockaway lateral project, which is to offer National Grid the ability to have supplies that are currently delivered to Long Beach routed more directly into NYC, here is a simple question that perhaps FERC is most best qualified to answer: Was Liberty's answer above factual? Can Liberty Natural Gas LLC deliver what appears to almost double the actual supply that is delivered through the existing Transco NYLBL without the Rockaway lateral project? How efficient is the current NYLBL?

How much of an uprate of the existing operating pressure of the Transco lateral would be required for this to occur. Liberty's project to be built without the Rockaway lateral expansion? How much would the M&R in Long Beach need to be altered? There appears to be discrepancy between what Liberty Natural Gas LLC is saying under their own docket with USCG and MarAd and the information in docket CP13-36 supplied by both Transco and FERC. This should be fairly simple for FERC and Transco to clear up. Can they answer the questions asked here?

Thanks,

Karen Orlando

IND220-1

See the responses to comment CM1-43.

IND220 – Karen Orlando (cont'd)

The attachments to this letter are too voluminous to include in this EIS. They are available for viewing on the FERC website at <http://www.ferc.gov>. Using the "eLibrary" link, select "General Search" from the eLibrary menu, enter the selected date range and "Docket No." excluding the last three digits (i.e., CP13-36, CP13-132, PF09-8), and follow the instructions. For assistance please contact FERC Online Support at FERCOnlineSupport@ferc.gov or toll free at 1-866-208-3676, or for TTY, contact 202-502-8659. The Category/Accession number for this submittal is 20131226-5002.

IND221 – Karen Orlando

20131231-5014 FERC PDF (Unofficial) 12/30/2013 9:56:07 PM

Ms. Bose,

I am submitting the following email to noaa re: the IHA for the Rockaway Delivery Project as it relates to any potential IHA may issue for the Port Ambrose Deepwater Port project as part of the public record of docket CP13-36.

"0648-XC784 Incidental Harassment Rockaway Lateral
pipeline and USCG-2013-0363 Port Ambrose deepwater
port project"

Me

To ITP.Magliocco@noaa.gov

Today at 7:05 PM

P. Michael Payne

Chief, Permits and Conservation Division, Office of Protected Resources, National
Marine Fisheries Service, 1315 East-West Highway, Silver Spring, MD 20910-3225

Hello,

IND221-1

I am writing regarding an application from Transco on March 21, 2013, requesting that you issue an Incidental Harassment Authorization (Authorization) for the take, by Level B harassment only, of small numbers of marine mammals incidental to the Rockaway delivery lateral project (Project) off the coast of New York from April 2014 August May 2014. Further revisions have been since made to the request in October 2013 due to a change in the project schedule (prime beach season off the coast of Riis beach) and the application was considered complete and adequate on November 9, 2013. As stated in your federal register notice "Transco proposes to expand its pipeline system to meet immediate and future demand for natural gas in the New York City market area. This project would provide an additional delivery point to National Grid's (an international electricity and gas company) local distribution companies, **giving National Grid the flexibility to redirect supplies during peak demand periods.** The in-water portion of the project, which would require pile driving, may result in the incidental taking of seven species of marine mammals by behavioral harassment."

I am not sure if your agency is **aware that the amount of supply** that the Rockaway Lateral Project gives National Grid the ability **to have redirected** from the existing delivery point of the existing 26 inch NYLB Lateral in Long Beach Long Island to the new receipt point in Floyd Bennett Field (part of Gateway National Recreation Area) **is about the same amount of supply that the Port Ambrose Deepwater Port** also currently proposed offshore **aims to then deliver** into the same existing Transco NYLBL to then deliver to Long Beach Long Island.

I believe these two projects both in the NY Bight, both either delivering gas to or from the same 26 inch existing subsea lateral and both potentially applying for and wishing to receive Incidental Harassment Authorizations from your agency should have been

IND221-1

See the responses to comments CM1-43 and IND43-1.

IND221 – Karen Orlando (cont'd)

20131231-5014 FERC PDF (Unofficial) 12/30/2013 9:56:07 PM

IND221-1
(cont.) | looked at together and cumulatively as they appear to be connected actions. The actions are being considered concurrently under different federal reviews.

Thanks,
Karen Orlando

I am certifying that all on the service list have received this document.

IND222 – Barbara Pearson

20140121-5188 FERC PDF (Unofficial) 1/21/2014 9:26:03 AM

Ms. Bose

IND222-1 I submit the following in response to Transco's December 17, 2013 and January 13, 2014 responses to Data Request #11.

December 17 response:

- *"The sites proximity to NYSDEC regulated tidal wetlands and their associated adjacent areas (i.e., regulated buffers) significantly reduces the buildable ground available for the proposed facility and significantly impinges upon areas adjacent to the building footprint that would be required for construction, operation, and maintenance."*

Submitted herewith is documentation dated December 2010 pertaining to the EAS for the Four Sparrow Marsh retail mall project that, in the early stages of the Rockaway Lateral project, was the reason this site was considered unavailable for use by Transco for their M&R station. This document states that that proposed project expected the mall to occupy 15 acres. This is a significantly greater area than the 2 acres the M&R station is supposed to occupy and yet this project's proponents saw no problem fitting their project into that space without impinging upon the tidal wetlands. How conveniently adverse impacts are either explained away as insufficiently problematic or, as in this case, given a high level of significance that appears to have been pulled out of thin air.

- *From 2009 through submittal of the FERC (7c) Application (Application) on January 7, 2013, additional analyses were conducted to prepare the Application including evaluation of wetland impacts, adjacent land use, long-term visual impacts, and lease and/or purchase potential for the parcel needed for the M&R facility.*

Details of the analyses and their authoritative sources have not been provided. Transco should be required to provide these.

- *In addition, due to the presence of the coastal bluff and the parcel configuration, any facility or building constructed on the site would be in full view of the residents in the adjacent community of Mill Basin. With limited space in relation to regulated buffers at the site, options to fully screen an M&R facility from view of residents' homes would be limited and could create the potential for a long-term visual impact which is not present at the currently preferred site because the M&R Facility will be completely enclosed with existing Hangers 1 & 2.*

IND222-1

See the response to comment IND177-5.

IND222 – Barbara Pearson (cont'd)

20140121-5188 PERC PDF (Unofficial) 1/21/2014 9:26:03 AM

IND222-1
(cont.)

Simple landscaping solved this problem for the Four Sparrow retail center (see graphic below from the draft scope document which is submitted herewith). Given how much smaller the



footprint of the M&R, it is therefore easily placed closer to Flatbush Avenue where the view of the M&R is that much more easily screened from the Mill Basin residents. And let's not forget those tidal wetlands – closer to Flatbush Avenue also eliminates the impingement on them.

January 13 response:

- Below is a revised version of Table 3.5-1 that provides values for the remaining factors for this alternative (Alternative 6). The table also reflects a slight adjustment to the factor that previously identified if an alternative "requires new building on park land (NPS or New York City)" – the factor now simply identifies whether or not an alternative requires a new building (on any property).

As a matter of convenience, the distinction between putting the M&R on park land or not in all the alternatives has now been removed from the table. This is a significant distinction that should not be removed from the analysis of the alternatives. If Transco is allowed to do this in this table, then they should be required to remove the text in all the alternatives that refers to placement on park land as a problem of that alternative.

The addition of a new building to any of the alternative sites is an insignificant issue when compared with alienation of the park land on which the hangars exist and into which Transco proposes to insert the M&R. This facility does not belong on park land and that is the overriding adverse impact.

IND222 – Barbara Pearson (cont'd)

20140121-5188 FERC PDF (Unofficial) 1/21/2014 9:26:03 AM

IND222-1
(cont.)

Note also that if Transco were even remotely as concerned about the park land of the area as it purports to be in its analysis of the alternative sites on NYC Parks Dept. land, then there's a great thing Transco could do for the citizens of NYC. Alternative site 6 has been the subject of much contention since the Four Sparrow Marsh retail project sought to take over what many acknowledge was land ceded to the NYC Parks Dept. A feature of the Four Sparrow Marsh project was officially and permanently mapping the land not used for the mall as parkland. Why doesn't Transco do something as positive for this part of Brooklyn? Leave the national park land to the park and be instrumental in getting even more park land (over 50 acres) created. Win-win. No ~~bribe~~ grants necessary.

IND222 – Barbara Pearson (cont'd)

The attachments to this letter are too voluminous to include in this EIS. They are available for viewing on the FERC website at <http://www.ferc.gov>. Using the "eLibrary" link, select "General Search" from the eLibrary menu, enter the selected date range and "Docket No." excluding the last three digits (i.e., CP13-36, CP13-132, PF09-8), and follow the instructions. For assistance please contact FERC Online Support at FERCOnlineSupport@ferc.gov or toll free at 1-866-208-3676, or for TTY, contact 202-502-8659. The Category/Accession number for this submittal is 20140121-5188.

IND223 – Barbara Pearson

20140127-5020 FERC PDF (Unofficial) 1/26/2014 11:36:06 AM

1/26/2014 Data Request: Information on Interconnect Agreement Request dated Nov 19, 2013 from Liberty Natural Gas LLC to Williams

Ms. Bose,

IND223-1 On Dec 20, 2013, Liberty Natural Gas LLC, under docket USCG-2013-0363 before USCG and MARAD <http://www.regulations.gov/#!documentDetail:D=USCG-2013-0363;1029> (page 197-Document previously submitted to FERC on Dec 26, 2013) stated:
"Liberty is proposing to construct, own, and operate a natural gas transportation infrastructure project with the specific purpose of importing and delivering natural gas into the Transco Lower New York Bay Lateral. On November 19, 2013 Liberty submitted an Interconnect Agreement Request to Transco's parent company, Williams. Liberty will coordinate with Williams in developing the interconnect agreement into 2014 and will keep the Coast Guard posted on the progress of the interconnection process."

Request that information regarding the Interconnect Agreement Request from Liberty Natural Gas LLC and its status or process be made available by Transco under docket CP13-36. When will Transco's parent company legally be able to say yes to the interconnect or have they already? What is required before Williams can authorize an interconnect agreement?

This information is requested as a few intervenors have long been asking about the connection between the two projects and FERC has been asked to include potential impact to NY Bight Species from the reasonably foreseeable Port Ambrose construction and operation under this docket and to make a determination on whether or not the Port Ambrose Project is a connected action reliant on the RDLF action.

Liberty's application was submitted in late September 2012. According to the strict timeline on the Deepwater Port Act review process, were it not number one as the USCG says, the storm known as Hurricane Sandy and a recent 90 day clock tolling which caused delay, apart from any other clock tolling or delays, the 365 day process for the Port Ambrose deepwater project would already have ended.

Thanks,

Karen Orlando

I am certifying that all on the service list have received this document

IND223-1

See the responses to comments CM1-43 and IND43-1.